

## Response to Inspector's Matters Issues & Questions on Darlington Local Plan

### Matter 5 – Meeting particular housing needs

**Q 5.1** – It is well-demonstrated that mixed development is best for community cohesion<sup>1</sup>, therefore it is disappointing that this policy is being weakened in its language. That developers are no longer expected to provide a mix of housing types that would meet local needs or to consider the site's character, seems to reduce effectiveness of the Plan. In practise, the implications of this weakening depend on whether or not the previous policy was enforceable. If it was not, then this new policy wording may be no less effective, however the stronger wording is preferred for clarity, effectiveness and soundness.

**Q 5.2** – It is unacceptable for the target proportion of accessible and adaptable new dwellings to be reduced so significantly. Bearing in mind the significant national push for "Lifetime Homes", and the fact that there will be many residents of Darlington living in homes which are unsuitable for their needs in that they are not accessible or adaptable to them, the new homes due to be constructed must meet the need from existing residents as well as new and future ones. The long-term aim should be that 100% of new homes are either accessible or adaptable. Due to the town's aging population, the need – and therefore market - for such accessible and adaptable dwellings is significant and only anticipated to increase. As most residents moving into a home may not know if they will need an adaptable home as they age, if they might suffer a life-changing accident, other health issue, or debilitating / progressive illness. They may never need to use the adaptability features, but they will make life much easier and allow them to remain in that home should they ever require these features. I would therefore argue that reducing the proportion of accessible homes to close to (but higher than by a significant margin due to induced demand) the number of households in the market to buy one was the more acceptable of the two housing categories to reduce, but only if this is absolutely required for viability. However, the proportion of adaptable homes must remain high, since adaptability should present no negative effects for the household, only potential positives should they (or future residents) require those features down the line. Building new accessible and adaptable homes is also likely to stimulate the market for such properties, as existing Darlington (and wider area) residents realise that they do not have to put up with living in an unsuitable home. I would therefore suggest that significantly more leeway / capacity should be allowed for both types of such homes over and above the most recent evidence from the SHMA 2020, to ensure the needs of less mobile / disabled people present and future can be more easily met going forwards. I do not have any concerns that a target of around 65% or more would impact on the viability of development, since Lifetime homes are likely to be seen as more desirable and hence attract a higher price.

**Q 5.3** – we do not dispute the updated figures suggesting that a higher number of affordable homes is required within the Borough, as there is clearly significant need for decent housing from residents of the borough living on low incomes, and this situation is likely to have worsened as a result of coronavirus and Brexit impacts. However, number of market-price homes should be reduced as a consequence, so the total number of homes required does not increase. The percentage of affordable housing required in market housing sites is too low – compared to other nearby areas such as Hambleton which require 40-50% (depending on area of that district) affordable housing<sup>2</sup> (p.10). If such high proportions can be achieved (plus additional rural exception sites) there, they should be sought in Darlington where the need for affordable housing is greater. Whilst I recognise that house prices in Darlington may be lower than the surrounding more rural areas, small low-priced developments like those in Darlington do exist in those areas. Historically, housing developers in Darlington have pleaded non-viability, and planning officers have not provided any push-back against this by making their own viability calculations, so have permitted

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<sup>1</sup> <https://www.jrf.org.uk/sites/default/files/jrf/migrated/files/2295.pdf> - Developing & sustaining mixed tenure housing developments (Summary), jrf.org.uk.

<sup>2</sup> <https://www.hambleton.gov.uk/downloads/file/1710/affordable-housing-spd>

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exceptions, to accept financial contributions in lieu of affordable housing. However, for a new Local Plan, a minimum of 20% affordable housing should be required in all wards for sites of greater than 10 homes, and rising to 40% in the most expensive wards to buy a home, in order to adequately meet the demonstrated need (and which is likely to rise as the impacts of Covid and Brexit continue to hit).

**Q 5.4** – Building on our comments on Q5.3, increasing the percentage of affordable homes required in the Borough would solve the anomaly resulting from the change to national planning policy, that at least 10% of homes must be available for affordable sale. In Darlington where only 10% of homes in the wards with the lowest prices are required to be affordable, this would mean that 100% of the affordable housing MUST be for affordable sale rather than rent. That position is illogical and unacceptable - as those who struggle to rent a home affordably will certainly fail to buy one – so in my view would render the plan ineffective and unsound. Darlington has a problem with low incomes, insecure jobs with part-time or zero-hours contracts (which would not be adequate to obtain a mortgage), with those not in employment, education or training, and with those on low incomes who are retired, disabled or in ill health, homemakers or not working for other reasons. It must be ensured that in those cheapest wards where the most vulnerable are most likely to live, this policy does not prevent people from being able to find an affordable new home for rent. This would otherwise introduce the perverse incentive that people would have to move to a different ward – away from family support – to find an affordable home for rent. The percentages of affordable housing required in market home developments of over 10 properties must therefore be increased to 20% ; 30% ; and 40% for the 3 tiers respectively, to ensure that ALL developments in all wards include properties for affordable rent, in order to make the policy effective and the Plan sound.

**Q 5.5** – We do not agree that the exemption of “executive housing” sites from on-site provision of affordable homes is consistent with national policy, nor justified. Building mixed developments, with provision of affordable housing on-site, is essential for best community cohesion within the development itself and its immediate area, and the town as a whole. Only by everyone mixing together can we all hope to understand each other and try our best to get along as a society. Allowing “executive” housing developments increases “exclusivity” for prospective home-owners and so profit for the developer (hence may seem desirable for both these groups), yet it often results in an unhealthy / distrustful and entitled sense of community, disconnected from other parts of society with a feeling that they “should have been a gated community”, and where any visitors to the development are viewed with suspicion. This is already causing problems where some residents of existing executive home developments do not wish outsiders to use their road as a through-route for walking / cycling / dog-walking etc. – as if they were a gated community – which is not possible if a public / permissive footpath to into one of the main cemeteries of the town is accessed from their estate. Such issues would only increase the more those on the richer end of the house-buying scale are able to feel that they have bought the expensive house, and therefore they should have control over the street / public space outside their house too, and be suspicious of anyone who does not live there. Hence over the long term it leads to undesirable and unhealthy effects in those residents who live in such communities too – so is overall only beneficial for developers, not for the fabric and society of the town. Such policies should therefore be eliminated from the plan in order to make it sound.

**Q 5.6** — We do not agree that the amendment to policy H6 on entry-level exception sites adjacent to settlements is necessary nor justified. There is adequate identified brownfield land within the Darlington urban area for such affordable housing schemes to be brought forward hence it is not necessary; and the service villages and rural villages would be covered already by the rural exception sites policy – both these aspects render this policy ineffective. This policy amendment seems aimed to allow greenfield development – more desired by developers – over brownfield sites closer to more sustainable town and district centres, hence I am surprised that this policy comes from para 71 of the NPPF (unless the NPPF itself is internally inconsistent). This because it is in direct contradiction with other national planning

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policies which state brownfield sites should always be prioritised. It also does not consider health and wellbeing, affordability and transport sustainability aspects (despite referencing that it should take into account policy DC1: Sustainable Design Principles and Climate Change – it appears to be considering the building design only). For example, transport costs and availability for lower income families, who may therefore be less likely to own a car, from edge-of-town sites to access jobs and services etc., and the building in of car-dependent lifestyles if they do (or have to buy one to get about). This policy should be removed from the Plan in order to make it effective and sound, or (if it is a requirement as part of the NPPF) at the very least it must be amended to ensure it cannot be used if suitable brownfield land is available which does not breach the development limits, and to require the provision of such sites within already allocated / planned development sites, so it does not result in additional greenfield land take.

**Q 5.7** – No comments on the specific policy. However, we have concerns regarding the treatment of the countryside between villages and the edge of Darlington, where significant housing allocations are proposed, such that those villages would become subsumed into Darlington as just another area of the town, losing their distinctive village feel. According to policies around rural (non-service) villages, this should not be allowed to occur, yet it is planned to occur nevertheless (as a result of inflated housing need figures as raised in our submissions on Matter 2, and large areas of brownfield land in the Town Centre Fringe remaining unallocated for development). This conflict between rural village development policies limiting greenfield development, national policy directing development primarily towards brownfield land, and yet this Plan making large greenfield strategic allocations renders the Plan damaging to the quality of life of existing village residents (and damaging to the quality of life of those areas requiring regeneration which will as a result remain undeveloped), ineffective (since what is the point of having policies around development around rural villages if they are ignored anyway), and therefore unsound.

**Q 5.8** – No comments on the specific policy. In principle, a greater density of development is more efficient in terms of energy use, and more able to support community shops and services, and public transport. However, high density development is best designed from the start, rather than allowing excessive infilling which may reduce valued community green space, replace permeable areas with impermeable roofs and paving and hence increase flood risk, and are generally able to be less well controlled so resulting in more negative impacts on the local community.