MATTER 5

Darlington Local Plan Examination in Public

Response to Inspectors Matters, Issues and Questions

Made on Behalf of The Church Commissioners for England

Matter 5- Meeting Particular Housing Needs

Introduction

1.1 This Hearing Statement is made on behalf of The Church Commissioners for England (our 'Client') in advance of making verbal representations at the Examination in Public of the Darlington Local Plan. Our Client has made comments throughout the Local Plan consultation process, including at the Pre-Submission Draft stage in December 2018.

1.2 This Hearing Statement represents our Client’s view on the overarching policies and targets in the Plan. These comments have been made in the context of our Client’s land interest at Hall Farm, Branksome (housing allocation reference 100). Measuring 22 hectares, the site is an allocated urban extension to the west of the main urban area with an indicative yield of 450 homes, including 270 which are estimated to be delivered during the plan period. Our client supports this allocation.

1.3 Our response to the relevant questions in Matter 1 is set out below. We have had specific regard to the tests of soundness outlined in the National Planning Policy Framework (NPPF); namely that the policies in the Local Plan must be justified, effective, positively planned and consistent with national policy in order to be found sound.
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?

1.4 The proposed change to Policy H4 ensures the policy is effective and positively prepared and therefore sound. The modification adds flexibility and will help ensure deliverability of housing sites across the borough.

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?

1.5 Please refer to our Client’s response to Matter 1, Q1.14 which sets out that the need and viability of M4 homes has not been justified due to a lack of evidence and is therefore not sound.

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?

1.6 Please refer to our Client’s response to Matter 2, Q2.3 which discusses that there is an acute need for affordable housing in the borough. Our response to Q2.3 goes on to state that the testing undertaken as part of the Viability Assessment concludes that for all scenarios in low value areas housing is not viable and schemes will not be able to contribute to affordable dwellings. Furthermore, the viability assessment states that some medium value areas are not viable and the majority of the remainder are marginal.