

Darlington Local Plan Examination in Public
Response to Inspectors Matters, Issues and Questions
Made on Behalf of The Church Commissioners for England

Matter 4- Housing Development**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.

Q4.1. Is there a reasonable prospect that a total of 2,652 dwellings will be built on the housing commitment sites listed in table 6.4 between 2020 and 2036?

- 1.4 There is not a reasonable prospect that over 2,600 dwellings will be built on committed sites up to 2036. There are 40 committed sites outlined in the plan but there is little to no information on their status, particularly those sites where construction has not yet begun or when planning permission will expire on site. These account for just over a quarter of committed sites in the plan as well as some of the largest commitments too including for example High Stell (198 dwellings and not yet started, site reference 45) and Land South of the Railway (330 dwellings not yet started (146). In accordance with the Planning Practice Guidance (PPG), the Council should demonstrate and set out how reasonable a prospect there is that all the commitments are developable, particularly those which have not yet had a start on site. Our Client would also like to point out that there is very little information on commitments. However, several sites are close to becoming expired and some are not expected to deliver housing until 2025 or 2026. Our Client questions why some committed site are due to be delivered so late after a consent being granted and if the Council has evidence for those sites where the consent is close to expiration.
- 1.5 Furthermore, not all planning permission will be delivered in full and in some cases residential permissions will lapse completely without delivering new dwellings. Local plans do normally build in a lapse rate and this varies across local authorities and is based on the evidence. However, the Council have not built in a lapse rate in their submission plan and not provided any evidence as to what the lapse rate has been over the past few years. It is particularly important in Darlington that a lapse rate is built in as commitments account for 40% of the housing requirement.
- 1.6 To be realistic and deliverable, the Council need to take into account non-delivery. As an absolute minimum, the lapse rate should be 10% but the Council should review the data, and provide the evidence as this number should be locally specific to the borough.

Q4.3. Was the approach to selecting the housing allocations in the Plan justified and consistent with national policy and guidance?

- 1.7 Paragraph 6.2.13 of the plan sets out a number of criteria which were used to select housing allocations. This sets out that development has taken into account sustainability principles by directing development to within the urban area and selecting those site which are in the most sustainable locations with good access to public transport, facilities and services.

Q4.4. Is the Council's proposed modification to policy H2 to distinguish between "strategic" and "non-strategic" housing allocations necessary to make the Plan sound and, if so, would it be effective in that regard?

1.8 Although our Client considers that the proposed changes are not needed to make the plan sound, the inclusion of "strategic" and "non-strategic" after each allocation is helpful and clears up any ambiguity between the two different types of sites.

Q4.14. Is the assumption that a total of 6,709 dwellings will be built on the allocated sites between 2020 and 2036 justified?

1.9 Our Client does not wish to comment on site's except their own and wish to reiterate to the Inspector that they agree with the trajectory and that they expect homes to be delivered on site by 2028 at a rate of approximately 30 dwellings per annum.

Q4.15. Has the Council provided clear evidence to demonstrate that a total of 735 dwellings will be built on the allocated sites without planning permission between 2020 and 2025?

1.10 Our Client does not wish to comment on other allocations but it is clear in some cases, the Council has not provided clear evidence clear or robust evidence that allocations will be built on allocated sites before 2025, particularly where a developer has not been identified.

1.11 In light of this, the Council should consider allocating further sites to ensure that there is some flexibility built in. This is also pertinent as the Council have not included a lapse rate.