

Miller Homes response to the Darlington Local Plan Examination  
**Inspector’s Matter, Issues and Questions**

Hedley Planning Services are instructed by Miller Homes in support of Land at Station Road, Middleton St George. The site was considered in part (northern section) in the Councils *Housing and Employment Land Availability Assessment* (2018) (Site 90 West of St Georges Gate, MSG) as suitable, available and achievable with an indicative yield of 109no. dwellings and in the Councils view could come forward within the 6-10 year period.

The southern section was not considered by the HELAA process.

## **Matter 4**

### **Housing Development**

#### **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?**

Whilst the table at 6.4 of the Local Plan sets out a list of committed sites, along with the size, total number of dwellings and the amount of dwellings remaining to be delivered on each site within the plan period it is not evident from the plan how the numbers have been arrived at.

Miller Homes assume that the delivery rates set out in table 6.4 have been agreed in consultation with the developers/landowners and whilst we do not intend to forensically examine each site it is noted from the table that 21 out of 40 of the sites listed have not yet commenced development.

#### **Q4.2. Is the assumption that a total of 2,102 dwellings will be built on the sites listed in table 6.4 between 2020 and 2025 justified? In particular, has the Council provided clear evidence for the assumption that 840 dwellings will be built on the sites of 10 or more dwellings with outline planning permission?**

As set out above it is noted that 21 out of 40 sites listed in table 6.4 have not yet commenced development on site/delivered any dwellings.

Of the 19 sites that have commenced the total capacity of remaining dwellings is 1,517 to be completed by 2036.

Whilst Miller Homes do not wish to comment specifically on any particular site it does appear that the assumption that 2,102 dwellings will be delivered based on the sites listed on table 6.4 between 2020 and 2025, the majority of which have not yet commenced development, is overly optimistic.

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

The Councils spatial strategy of focusing the main area of growth around the urban area of Darlington has been supported throughout the development plan process by Miller Homes. Miller Homes however have consistently objected to the spatial distribution associated with the allocated sites.

Policy H2 allocates 6,709 dwellings in the plan period in total with only 280 of these dwellings allocated to the service villages. As referenced through the plan and its evidence base the service villages are

clearly sustainable locations for housing development and as we have argued in previous matters, further development should be distributed towards Middleton St George in particular being the largest of the three service villages.

Some of the more major allocations set out in Policy H2 will require complex land ownership negotiations, complicated planning applications and major infrastructure works before development is able to come forward. It is not clear from the evidence what impact these factors will have on the delivery rates associated with these sites but on the face of it the delivery rates set out in the plan appear to be overly optimistic.

In this context and to ensure delivery of the Councils housing requirement Miller Homes consider a more evenly distributed spatial strategy that avoids over reliance on some of the larger sites would be more appropriate.

The Miller Homes site at Station Road, Middleton St George was in part considered suitable, available and achievable with an indicative yield of 109no. dwellings through the HELAA (2018) process and in the Council's view could come forward within the 6-10 year period.

#### **Q4.4 – Q4.13**

No comments

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

As set out above some of the more major allocations will require complex land ownership negotiations, complicated planning applications and major infrastructure works which will create a large lead in time before any dwellings are delivered. The delivery rates associated with some of the sites also appear to be overly optimistic.

In the opinion of Miler Homes the 6,709 number is overly optimistic based on the evidence. As such the delivery of housing in accordance with the plan is unlikely to occur.

Without the allocation of further deliverable small to medium sized sites the plan is therefore unsound.

#### **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?**

No the evidence is not clear – In the opinion of Miller Homes the delivery rate from allocated sites without planning permission again appears to be overly optimistic. The delivery of these 735 dwellings is critical to the Council maintaining a five year housing supply and the resultant impact of some of these sites being delayed would mean that the Council are unable to demonstrate a five year supply of housing development against their housing requirement.

This goes to the heart of the soundness of the plan.

Without the allocation of further deliverable small to medium sized sites the plan is therefore unsound.

**Q4.16. Is it reasonable to assume that, in addition to the supply identified in the Plan, around 600 dwellings are likely to be built on windfall sites during the Plan period? If so, is it necessary to modify the Plan to refer to such an assumption?**

The Council have indicated in their response to PQ27 that it would be difficult to estimate the amount of windfall development that would occur over the plan period due to the age of the exiting policies and allocations.

If there is no compelling evidence for a windfall rate then in the opinion of Miller Homes it would be contrary to paragraph 70 of the NPPF to include this in the plan.

**Q4.17. Will the Plan be effective in ensuring that sufficient land will be available to allow at least 9,840 net additional dwellings to be completed in the Borough between 2016 and 2036?**

No - for the reasons set out above and in particular due to the overly optimistic delivery rates associated with sites with planning permission and allocations.

Whilst it is noted from the housing trajectory that the Council have included a buffer associated with the delivery rate the reliance on large complex sites with complicated lead in times, in the opinion of Miller Homes, risks the overall delivery rate.

**Q4.18. Would basing the five year requirement on 422 dwellings per year be effective in helping to ensure that identified needs, and the target of 492 dwellings per year, can be met?**

No – Miller Homes have argued in previous matters that the Councils housing requirement should be based on the higher number of 492 dwellings per annum.

If the five year housing supply target is set on the lower number the plan would not be effective in meeting the overall housing requirement.

**Q4.19 – 4.20**

No comments

**Q4.21. Is the approach set out in policy H1 to allowing development outside development limits if there is no longer a demonstrable supply of sites to fully meet the five year requirement justified and consistent with national policy?**

Miller Homes support the inclusion of the wording within policy H1 that would allow development outside of the development limits if the Council are unable to demonstrate a five year housing supply. The policy wording should be modified to include a link to the housing requirement figure of 492 dwellings per annum.

Miller Homes would also argue that sustainable edge of settlement sites such as the land at Station Road, Middleton St George that was considered suitable, available and achievable in the HELAA process, should be able to come forward in any event to ensure a five year supply is maintained in the first instance.

**Q4.22 – 4.23**

No Comments