

# Darlington Local Plan Examination

## Matters 4 & 9 Hearing Statement

---

Persimmon Homes Teesside

May 2021

The following statement has been produced by Persimmon Homes Teesside in response to selected questions set out in Matter 4 of the Inspector's Matters, Issues; Participants; and Hearing Programme dated 1<sup>st</sup> April 2021. Whilst we have not attempted to provide a response to every question, we have, where applicable, included the Inspector's Issues and Questions in **Bold** above our response for ease of reference.

## **Matter 4**

### **Commitments**

**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?**

Since Table 6.4 was original produced a number of sites including the land at Berrymead Farm have received planning permission, albeit in outline, and are therefore now commitments. Whilst we do not have involvement in any of the other commitments and therefore reserve comment at this time on those sites, we can confirm that 2 Reserved Matters Applications for 246 of the approved 370 dwellings have been submitted for approval on Berrymead Farm. Major, national house-builders are behind these two applications with the developer of the final third of the site to be confirmed in the near future. We therefore believe that the delivery of 370 units on the Berrymead Farm site is a realistic prospect between 2020 -2036.

**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?**

In respect of Berrymead Farm we believe that the Council's estimate of 240 dwellings being delivered up to March 2025 to be an accurate assessment given that there are currently 2 reserved matters pending by two major house-builders on the site for 246 units with a third to follow in the near future. Both Persimmon Homes and Taylor Wimpey are planning for an immediate site start once Reserved Matters approval is granted (expected summer 2021).

### **Methodology for Selecting Housing Allocations**

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

Whilst Persimmon Homes generally support the Council's approach to selecting the housing allocations in the Plan, believing it to be consistent with national policy and guidance we have concerns that the bulk of the Council's longer term housing strategy is tied up by a single major strategic site owing to deliverability and viability concerns given the large swathes of land in multiple land ownerships.

### **Skerningham strategic site allocation (policy H10)**

**Q4.5. Is the proposal in policy H10 for the development of up to 4,500 dwellings; a neighbourhood centre; two primary schools, a secondary school, and other community facilities; roads and other transport infrastructure; and a network of green and blue infrastructure on 487 hectares at Skerningham justified? In particular:**

- a) **Would the development be suitably located in the context of policy SH1?**
- b) **Is there a reasonable prospect that the site will be available and could be viably developed at the point envisaged?**
- c) **Subject to the modifications proposed by the Council, would the requirements of policy H10, along with other relevant policies in the Plan, be effective in achieving sustainable development on the site having regard to NPPF 72?**
- d) **Does paragraph 6.10.10 need to be modified with regard to reference to a northern link road? Is the designation of a northern link road on the key diagram (map 1) and the Skerningham masterplan framework (figure 6.1) justified?**

**4.6. Are the assumptions in the housing trajectory (appendix A) about the Skerningham strategic site justified, including that 1,650 dwellings will be completed by 2036? Has the Council provided clear evidence that development will begin in 2024 and that 90 dwellings will be completed by 2025?**

In relation to questions 4.5 and 4.6, whilst Persimmon Homes applauds the Council's aspirations in seeking to deliver a strategic allocation of this magnitude Persimmon Homes are concerned with the overall deliverability of the site in the short to medium term and the impact this will have on the overall plan if the site does not come forward in the timescales envisaged.

We have significant experience around the County in seeking to deliver large scale strategic allocations across multiply ownerships and given the lack of the house-builder involvement at this stage, we believe given the various landownerships, masterplan work, policy, legal and contractual obligations required before a spade is even put in the ground we do not see a meaningful site commencement within the first five years of the plan period.

We would therefore suggest a further amendment to the plan to account for this delay and in its present form consider the plan unsound.

#### **Total supply from housing allocations (policy 2)**

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

We would refer to our responses above in relation to the concerns over the short-medium term deliverability of the Skerningham site. Whilst it is recognised given the scale of the site that there will be multiply outlets once the development is commencement, it is understood that the allocation is expected to deliver 1,800 units

over the plan period which we believe to be very aspirational given the amount of work required ahead of the site receiving planning permission or a site start.

We would therefore suggest a further amendment to the plan to account for this delay and in its present form, consider the plan unsound.

### **Windfalls**

#### **4.16. 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 existing Darlington Local Plan was adopted in 1997 and therefore historically the borough has needed to rely on an out of date policy position in order to maintain a five year land supply position which has meant that the supply of windfall sites has been artificially increased due to the lack of new allocations.

The planning system is a plan-led system and whilst Persimmon Homes accept that an element of windfall development will come forward over the plan-period, the focus should be on delivering sites through the plan-making process. Persimmon Homes therefore cannot support the figure of 600 dwellings and would suggest that instead efforts are made to identify additional deliverable allocations such as the wider land at Berrymead Farm, Darlington. A figure of 300 dwellings delivered by windfalls is considered appropriate and reflective of the overall proportions to the total plan numbers.

We would therefore suggest a further amendment to the plan to account this change. Persimmon Homes object to the current plan approach and consider it unsound and inconsistent with national policy in its present form.

## **Matter 9**

### **Q9.9. Subject to the Council's proposed modification, is policy IN9 consistent with national policy relating to renewable energy infrastructure? In particular:**

- a) the criteria for wind energy development in part (a).**
- b) the criteria for solar power development in part (b).**
- c) the requirement for developments of over 300 houses to be enabled for district energy connection unless demonstrated not to be feasible or viable.**

In relation to part c of the policy, Persimmon Homes strongly object to the requirement for development of over 300 houses to be enabled for district energy connection. There are significant changes occurring nationally in respect of Building Regulations and this policy effectively doubles up on the building regulations, introducing an additional, onerous requirement above currently regulations whilst also likely to be superseded by any future expected changed to the regulations. As such with the inclusion of this policy we consider the plan unsound.