

Mr G Raistrick's response to the Darlington Local Plan Examination
Inspector's Matter, Issues and Questions

Hedley Planning Services are instructed by Mr G Raistrick in support of Land at Heighcroft House, Heighington. Mr Raistrick's land is in single ownership and has not been considered either in the Darlington Housing and Employment Land Availability Assessment (HELAA, March 2018) or in the Heighington and Middleton St George - Draft Spatial Plan Consultation (December 2017).

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.

The PPG sets out how an authority can demonstrate there is a reasonable prospect that housing sites are developable, this includes evidence such as a written commitment or agreements that relevant funding is likely to come forward, written evidence of agreement between the local planning authority (LPA) and the site developer which confirms the developers delivery intentions and anticipated start and build-out rates, the likely build out rates based on sites with similar characteristics, and the current planning status.

Mr Raistrick assumes 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 examine each site it is noted from the table that 21 out of 40 of the sites listed have not yet commenced development.

It is noteworthy that both sites in Heighington are very nearly complete. Site Ref. 34. Beech Crescent West, being built by Homes by Esh, have one plot remaining, and Site Ref. 91. Walworth Road, being built by Bellway Homes, have eight plots remaining and therefore both sites are likely to be completed in 2021.

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 Mr Raistrick does 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?

As set out above, the current development sites within Heighington will be complete in 2021. The Local Plan proposes to allocate a single development site in Heighington (Site Ref. 95 – Beech Crescent East, Heighington), with an indicative yield of 20 houses. This equates to 1.33 dwellings per year over the remaining 15 years of the proposed plan period. No allocation is proposed for Hurworth.

Given the projected reduction in average housing size (as referred to in paragraph 2.22 of SD09 Darlington Strategic Housing Market Assessment (SHMA) 2017 and paragraph 3.2 of the Housing Topic Paper February 2021), this will result in reduction of population of Heighington over the remainder of the plan period.

Therefore, the allocation of a single site for 20 dwellings in Policy H2 will not ensure that there is a *“level of development will meet local needs and facilitate the economic diversification of rural areas”* as required by Policy SH1 and paragraph 78 of the NPPF, which requires that *“housing should be located where it will enhance or maintain the vitality of rural communities.”*

Furthermore, some of the more strategic 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, Mr Raistrick consider a more evenly distributed spatial strategy that avoids over reliance on some of the larger sites would be more appropriate.

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 Mr Raistrick, 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?

The Five Year Supply Position Statement (June 2020) provides more information in relation to the allocated sites. It is considered that in some cases the Council has not provided clear evidence to demonstrate that the allocations will be built between 2020 and 2025.

The delivery rate from allocated sites without planning permission is considered 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.

To ensure five year supply delivery rates are accurate, the Draft Plan needs to make allowances for further small to mid-sized allocation sites directed towards the Service Villages to ensure assessed housing need is met in full whilst the larger Urban Extension sites progress.

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 existing policies and allocations.

If there is no compelling evidence for a windfall rate then 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, it is considered that these sites could impact on 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?

It is considered that basing the five year requirement on 422 dwellings per annum is not effective or justified. We maintain that the higher figure of 492 dwellings per annum should be the minimum requirement which includes an uplift to support economic growth aspirations based on 2017 SHMA evidence.

Assessing the housing land supply position against a minimum housing requirement of 492 net dwellings per annum would be a positive approach, ensuring that housing needs are met in full and the Council's economic growth aspirations are supported by sufficient housing. In this regard the approach is justified in accordance with the NPPF.

Q4.19. – Q4.20.

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?

Mr Raistrick supports 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.

Mr Raistrick would also argue that sustainable edge of settlement sites, such as the Land at Heighcroft House, Heighington should be able to come forward in any event to ensure a five year supply is maintained in the first instance.

Q4.22. Will the Plan be effective in ensuring that sufficient suitable land will be available for people wishing to commission or build their own homes (self- and custom-build homes)?

Policy H4 states that to increase housing options, the Council will encourage and support the delivery of custom and self-build housing. It goes on to state that the Council will monitor the demand for this type of housing and will assist in the delivery of sites. It does not however, provide any further details as to how this will be done or provide clarity for build development.

Furthermore, no evidence has been provided that self- and custom-built plots will be delivered through the proposed allocations. The Local Plan Viability Assessment (Ref. CD08) makes no assessment either of the typology or inclusion as part of larger site allocations. We note that both Policy H10 and H11 make reference to self/custom build housing, but no detail is provided regarding delivery.

To be found sound and to ensure the delivery of custom and self-build housing specific sites should be identified. It is considered that the Land at Heighcroft House, Heighington is suitable and appropriate for self- and custom-build housing.

Q4.23. Will the Plan be effective in helping to ensure that at least 10% of the housing requirement is met on sites no larger than one hectare?

No Comment