

## Darlington Local Plan

### Inspector's Matters, Issues and Questions for Examination

#### Response on behalf of Taylor Wimpey (UK) Ltd

#### 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?

Since the preparation of table 6.4 in the Plan a number of other sites have been granted planning permission and should therefore be included in this table as commitments. This includes Berrymead Farm (site 8) which Taylor Wimpey have an interest in alongside Persimmon Homes and Northumbrian Land. Outline planning approval was granted for up to 370 dwellings in February 2020 (ref: 15/00804/OUT). Reserved matters applications are now pending for both the Taylor Wimpey and Persimmon phases of development totalling 247 dwellings. It is anticipated that the Taylor Wimpey phase of development will be completed by 2025 and well before 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?

As outlined above, Taylor Wimpey are progressing with their part of the Berrymead Farm site (now a commitment so should be included in the updated table 6.4) which is one of the sites that has outline planning permission. The reserved matters application for 124 dwellings has been submitted and it is envisaged that, subject to the timely granting of reserved matters approval, Taylor Wimpey will be on site by the end of the year with the first completions in 2022 in line with the Council's trajectory at Table 6.2.

In terms of Taylor Wimpey's other interest (Coniscliffe Park South – site 041), the site is subject to a pending outline planning application (ref: 17/00632/OUTE) for up to 535 dwellings and, as such, is not yet a commitment but delivery from the site is included in table 6.4 between 2020 and 2025. The position with the pending application is outlined further below along with further details of anticipated delivery from the site. However, Taylor Wimpey agree with the Council's trajectory for the site (in response to PQ28) and envisage that at least 90 dwellings will be completed by 2024/25 subject to the Council granting outline planning permission and subsequent reserved matters approval in a timely manner.

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?

Yes – Taylor Wimpey consider that the Council's proposed modification is necessary to make the plan sound and agree that it would be effective in that regard.

In particular, Taylor Wimpey support the identification of Coniscliffe Park South as a strategic housing allocation under policy H2 and the recognition of its importance in assisting to meet the market and affordable housing needs across the Borough over the plan period.

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; other community facilities; roads and other transport infrastructure; and a network of green and blue infrastructure on 487 hectares at Skerningham justified?

Taylor Wimpey have the freehold interest in a small area of land extending to 0.66 ha which forms part of the wider Skerningham Strategic Allocation. The land is adjacent to Harrogate Hill.

As outlined in previous representations, whilst Taylor Wimpey fully support the identification of their land as part of the wider strategic allocation, they do not support the Skerningham Masterplan Framework at Figure 6.1 of the Submission Local Plan as it currently shows their land as Strategic Green Infrastructure.

As outlined in Taylor Wimpey's representations to the Draft Local Plan, Submission Draft Local Plan and the HELAA submission, the site is not restricted by any technical constraints and would represent a logical infill development. Moreover, Taylor Wimpey consider that the site vehicular and pedestrian access could be provided directly from Harrogate Hill and that any scheme could be designed to provide pedestrian access to the wider areas of Strategic Green Infrastructure proposed by the Masterplan Framework. The site can therefore come forward independently of the wider strategic allocation.

Q4.10. Are the proposed Coniscliffe Park South and Coniscliffe Park North housing allocations, with total capacity for around 1,520 dwellings and respective indicative yields of 420 and 630 dwellings during the plan period, justified?

a) Would the development be suitably located in the context of policy SH1?

Yes, it is considered that the development is suitably located in the context of policy SH1. As set out below, the site is located in a sustainable location on the western edge of Darlington.

b) Subject to the Council's proposed modifications, would the requirements of appendix B, along with relevant policies in the Plan, be effective in achieving sustainable development on the site?

Coniscliffe Park South (site 041) is subject to pending outline planning application (ref: 17/00632/OUT) submitted in July 2017 and is supported by a full suite of supporting technical documents.

The outline planning applications (alongside the application relating to Coniscliffe Park North) were scheduled to be considered by the Planning Committee in June 2019 with a recommendation for approval but both applications were withdrawn from the agenda by the Local Planning Authority prior to the Committee meeting, having been considered premature to the emerging Local Plan

The 5<sup>th</sup> June 2019 Committee Report concluded:

*"The planning applications have been considered both individually but also cumulatively in terms of their location and connectivity with the western edge of the urban area and their impact on matters such as residential amenity, flood risk, ecology, trees, noise, air quality, Public Rights of Way and the local and strategic highway network.*

*It is considered that with the imposition of appropriate planning conditions and the offsite highway mitigation measures that have been agreed with the Council and Highways England the planning application site and also the adjacent site to the north can be redeveloped for residential purposes (and the associated uses in the 17/00636/OUTE proposal) without causing significant harm to the surrounding area, local residents and the highway networks*

*The planning application is being recommended for approval subject to a Section 106 Agreement and planning conditions."*

The deliverability of the site has been demonstrated through the advanced position of the outline planning application which was recommended for approval in the Committee Report for the 5<sup>th</sup> June 2019 committee. As such, there are no outstanding technical matters and the Section 106 Heads of Terms have also been agreed by all parties. The landowner is looking to dispose of the site for housing and Taylor Wimpey are a willing developer, have a contractual position with the landowner and are looking to deliver much needed new market and affordable housing without delay.

The site is an excellent deliverable proposition for housing development being promoted by a housebuilder with a proven track record of delivering housing in Darlington and the Tees Valley. The development will deliver significant benefits which are enhanced through the delivery of the land to the north (Coniscliffe Park North). Taylor Wimpey continue to work closely with Gladman on the promotion of the respective sites to ensure the timely delivery of this important strategic new development.

The Document submitted alongside Taylor Wimpey's Submission Draft representations outlines the material benefits that will flow from the granting of planning approval for the Taylor Wimpey development and provides justification to support the allocation of the site in the emerging Local Plan. It concludes that the development proposals will:

- Deliver up to 535 homes in a sustainable location helping to meet the Council's identified housing needs which have been confirmed by the Review undertaken by Hatch Regeneris.
- Deliver up to 107 affordable homes to help meet the Council's significant and increasing affordable housing needs. As confirmed by the review undertaken by Pioneer Housing and Development Consultants, the affordable housing delivery is a benefit that represents a material consideration of significant weight in favour of the proposals.
- Provide over 12 hectares of green infrastructure with associated recreational and ecological benefits.
- Provide approximately 0.45 hectares of allotments to help meet an identified need. Darlington's Open Space Strategy confirms that demand for allotments exceeds supply.
- Significantly improve the Baydale Beck Corridor and link to the Merrybent Community Woodland both of which are identified as key elements of green infrastructure.
- Deliver highway improvements which will result in improvements to peak hour journey times on key routes within Darlington i.e., average journey times with the developments and associated improvements in place will be lower than 2032 baseline levels.

- Provide a range of other economic and social benefits as outlined on the Lichfields Infographic including £3.1 million in New Homes Bonus payments and £815,000 per annum in Council Tax revenue; and deliver Section 106 contributions totaling £1.15 million.

The pending outline planning application for the site fully addresses the issues and requirements outlined in the Housing Allocation Statement (Appendix B of the Local Plan) and takes into account the requirements suggested in the Council's proposed modification.

In view of the above, it is clear that the scheme is significantly more advanced than the majority of other draft allocations. Taylor Wimpey fully support the identification of the site as a housing allocation in the Submission Local Plan and it has been demonstrated that the site is a deliverable proposition that will help meet the market and affordable housing needs of the Borough in the first five years of the plan period and beyond.

- c) Are the assumptions in the housing trajectory (appendix A) about the sites justified, including that a total of 1,050 dwellings will be completed on the two sites by 2036? Has the Council provided clear evidence that development will begin in 2022 and that 170 dwellings will be completed on the two sites by 2025?

Taylor Wimpey are extremely keen to get on site and start delivering much needed market and affordable housing. Their commitment to the site has been clearly demonstrated through the submission of an outline planning application in advance of securing an allocation in the Local Plan. The site is a key outlet for their North Yorkshire Business Unit and, in anticipation of the Council determining the outline planning application in the near future, work has already commenced on the detailed layout needed for the reserved matters application. In addition, Taylor Wimpey are progressing with the drafting of the S106 agreement, in line with the agreed Heads of Terms, with a view to having it signed shortly after the application is considered by Planning Committee. At this stage, the only issue holding up the delivery of the site is the granting of outline planning permission.

As such and subject to the timely granting of outline planning permission and subsequent reserved matters approval, Taylor Wimpey would anticipate at least 90 completions from the site by 2024/25 as suggested in Appendix A and the Council's response to PQ28.

It is also anticipated that the Taylor Wimpey element of Coniscliffe Park will be completed within the plan period (by 2036) and, as such, the Council's assumptions in the housing trajectory are justified.

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?

From the latest figures available, it appears that the total housing land supply for the plan period is 9,361 dwellings (commitments & allocations figure as set out in the Proposed Modifications Table) against a housing target of 9,840 dwellings (492dpa). It is noted that the Council have included a modest windfall allowance of 25 dwellings per annum for sites under 10 units, but this is unlikely to ensure the level of flexibility needed.

There is reference in the Council's response to the Inspectors initial question to an updated trajectory being prepared. Taylor Wimpey would ask that this is provided as soon as possible as it is not currently possible to fully understand the suggested supply position and what has led to the proposed modification.

Based on the figures available, it appears that the suggested supply is below the 9,840 requirement and, as such, there is an under allocation and the Council need to consider allocating more land for housing development. Taylor Wimpey advise that the Council include at the very least a 5% (i.e. over allocate) buffer on the whole plan target to ensure that the housing target is met and there is also a safeguard against sites not coming forward as envisaged but best practice as endorsed by the Local Plan Expert Group would be to over allocate but up to 20%. Such an approach would be in line with NPPF, and it would ensure that the plan is positively prepared and therefore sound.

On this basis, the Council must consider allocating additional sites for residential development including the Land South of Coniscliffe Road and additional Land at Berrymead Farm which have previously been promoted by Taylor Wimpey.

In addition, and to ensure additional flexibility, the inclusion of more flexible wording to policy H1 to provide a mechanism for suitable windfall development, outside of the development limits, to come forward over the plan period would also assist in meeting the housing needs.

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?

As set out in our Matter 2 response, Taylor Wimpey consider that the housing requirement for the plan should be a minimum of 492 dwellings per year. As such, it is considered that basing the five-year requirement on 422 dwellings per year would not be effective in ensuring that identified needs are met. The lower figure being used for 5 year supply purposes with simply cause the higher target not to be met if allocations and commitments fail to deliver. The gateway to the release of other sites through the 5 year housing land supply position will only allow the non-delivery to be corrected to a figure equivalent to 422 dpa which for the reasons outlined in Taylor Wimpey's representations on Matter 2 would therefore not meet identified needs.

The Council have identified 492 dwelling per year as their housing need and, as such, the plan should aim to meet that. Such an approach would be positively prepared and in line with national policy.

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?

Taylor Wimpey support the principle of approach set out in policy H1 and consider it to be justified and consistent with national policy. However, as set out in their response to Matter 3, restricting this to only the main urban area and service villages is not considered to be justified nor is it consistent with national policy which encourages housing development in rural settlements to help support the vitality and viability of rural communities (NPPF para. 78). A number of the rural villages identified in the settlement hierarchy are sustainable in their own right and could support further development not just for affordable housing as policy SH1 is currently worded.

Taylor Wimpey therefore consider that the policy should be amended as follows:

*At any point in the Local Plan period where there is no longer a demonstrable supply of sites to fully meet the five year land requirement, sustainable housing sites located beyond development limits, that would make both a positive contribution to the five year supply of housing land and be well related to the development limits of the main urban area or service villages (as defined in Policy SH 1) of a settlement will be supported.*

