

EXAMINATION OF DARLINGTON LOCAL PLAN
BANKS PROPERTY RESPONSES TO INSPECTOR'S NOTE 4:
MATTER 4. HOUSING DEVELOPMENT

FILE NOTE

LP/NE/3915/PL-2

1 Matter 4. Housing Development

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?

We believe the approach to selecting housing allocations in the Plan is justified and consistent with national policy and guidance. Banks Property support the spatial distribution of new housing which focuses on sites within the main urban area and strategic urban extensions, including Skerningham (site 251). Paragraph 6.2.9 of the Proposed Submission Local Plan (core document 01) acknowledges that some of the strategic urban extensions will take time to deliver housing due to infrastructure requirements and therefore suitable sites in service villages that could be delivered in the short and medium term have also been included.

Whilst supporting the approach to housing site selection, as set out in our response to questions 4.14, Banks Property believe that the inclusion of a small number of additional sites within the service villages would provide greater certainty on the Borough meeting its housing targets whilst not undermining the spatial distribution of housing set out within the Local Plan for example, the site at School Aycliffe Lane, School Aycliffe promoted by Banks Property.

Skerningham strategic site allocation (policy H10)

Q.4.5. 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?

Banks Property support Policy H10 which identifies Skerningham as a strategic allocation for up to 4,500 dwellings. The site will have a key role in delivering sustainable growth in the Borough and wider Tees Valley in the short, medium and long term making valuable contributions to the housing land supply as well as direct and indirect economic benefits.

The site is in a sustainable and accessible location on the edge of the Darlington Urban Area, the highest tier of settlement in the settlement hierarchy and therefore in suitably located in the context of policy SH1.

The western part of the allocation being promoted by Banks Property (referred to as Beaumont Hill) is one of the most sustainable and accessible parts of the site by virtue of being located on

an existing arterial route (A167) into Darlington. The A167 is a key public transport corridor with a high frequency of bus services into Darlington.

b) Is there a reasonable prospect that the site will be available and could be viably developed at the point envisaged?

Banks Property will bring the western part of the Skerningham allocation forward as a separate planning application imminently and this position is acknowledged by the council in their response to PQ29 (DBC1). As set out in our representations to the Proposed Submission Local Plan (core document 01) more detailed masterplanning and technical work has been undertaken on the land to the west of the railway line to demonstrate that the site is deliverable and following market testing and discussions with a number of housebuilders Banks Property are confident that the housing completions will be achieved within the five year period. Banks Property support the council's housing trajectory for Skerningham with housing completions programmed from 2023 with increased delivery from 2024 onwards.

All of the western area of Skerningham will be delivered within the local plan period up to 2036 in accordance with the housing trajectory for Skerningham set out in Appendix A of the Proposed Submission Local Plan (core document 01).

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?

The key principles set out within Policy H10 demonstrate a commitment to bringing forward a high quality development focusing in particular with regard to maximising sustainable development opportunities and a network of green and blue infrastructure to enhance the green network to the north of Darlington. The criteria in the policy encapsulates the requirements of criterion a-d of paragraph 72 in NPPF.

Subject to the relocation of the proposed community/retail facilities on the western part of the housing allocation, we believe that Policy H10 will be effective in achieving sustainable development on the site having regard to paragraph 72 of NPPF.

Policy H10 (c) identifies the need to provide other local community facilities to serve residential areas as required, closely related to public transport, walking and cycling facilities. Such a potential location is identified on the Beaumont Hill site in figure 6.1. Banks Property believe the location of such uses should be located in the north west corner of the site and close to the existing A167 where there is already an existing need for such a facility. The A167 is a key public transport corridor and the most sustainable location for retail facilities which accords with criteria (iii) of the policy. Whilst appearing to be peripheral to the wider Skerningham proposals, it should be noted that the East Coast Mainline acts as a significant barrier and therefore the proposed location would not be able to be utilised by new residents on the eastern side of the railway line. The location also does not appear to take account of existing housing allocations/commitments to the west of the A167 (South of Burtree Lane and Berrymead Farm) where planning permission has now been granted.

Taken in the context of the Skerningham Strategic Allocation and other allocations to the north of Darlington, Banks Property believe that the proposed location of the community/retail facility as identified on the Banks Property concept plan close to the A167 is a more appropriate location than the area identified in figure 6.1 (Skerningham Masterplan Framework) which closely relates to public transport and will serve all of the proposed development to the north of the town and aligns with the requirements of paragraph 72 of NPPF.

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?

The Councils response to the Inspector's Preliminary Questions PQ 39 and 80 (CD DBC1) confirms that the northern link road is not required to facilitate the development proposed during the plan period including the Skerningham Strategic Allocation. The northern link road is still at the design phase and has yet to be fixed to enable either a safeguarded route to be included on the proposals map or by virtue of a planning consent. No such planning application has been lodged to date.

To ensure consistency with the modifications to both Policy IN1 part C(v), we believe that the designation of the 'potential northern link road' and link to Skerningham should be omitted from key diagram (map 1), Policy H10 g and the Skerningham masterplan framework (figure 6.1).

Q.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?

As set out in our response to question 4.5 b), Banks Property agree with the assumptions included in the housing trajectory regarding the delivery of 90 dwellings completed by 2025 and the western part of the Skerningham allocation being delivered in its entirety by 2036 making a significant contribution to the 1,650 dwellings anticipated from the wider site by that date.

Total supply from housing allocations (policy 2)

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

Banks Property support the trajectories for both Skerningham (site 251) and Beech Crescent East, Heighington (site 95). Evidence has been provided to demonstrate that planning applications will be submitted for the western part of Skerningham and Beech Crescent East imminently and that both sites will deliver housing completions before 2025.

Paragraph 6.2.9 of the Proposed Submission Local Plan (core document 01) acknowledges that some of the strategic urban extensions will take time to deliver housing due to infrastructure requirements and therefore suitable sites in service villages that could be delivered in the short and medium term have also been included within the local plan.

Banks Property consider that housing trajectories for the later years of the local plan appear overly optimistic. We believe that the total of 6,709 dwellings built on allocated sites between 2020 and 2036 is unlikely to be achieved and therefore not justified. This is likely to have implications on the council meeting housing requirements in the later years of the local plan.

Q.4.15. 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 Council's evidence demonstrates that a number of allocated sites either have planning applications pending consideration or due to be submitted shortly after the adoption of the local plan. The table included in the Council's response to PQ29 illustrates that the majority of completions will be from sites that are allocated but already have planning permission with only small amount of completions from allocated sites without permission. Banks Property therefore

believe that clear evidence has been provided to demonstrate that a total of 735 dwellings will be built on the allocated sites between 2020 and 2025.

As per our response to Q.4.14, it is the later years of the local plan where delivery rates appear overly optimistic.

Overall housing supply for the plan period (appendix A)

Q.4.17. 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?

As set out in our responses to question 4.14, we believe that the Plan may not be effective in ensuring that sufficient land will be available to allow 9,840 dwellings to be completed within the plan period. This is largely due to the level of completions for some of the large strategic sites where more housing completions may fall outwith the plan period than have been programmed.

This would support the need for either additional housing sites to be allocated or for a more flexible policy should there be housing land supply issues.

Five year housing land requirement and supply (policy H1)

Q.4.18. 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. As set out in our response to Matter 2, Banks Property support the councils housing target of 492 net additional dwellings per annum over the plan period from 2016 to 2036 which takes into account the councils economic growth aspirations.

We believe that the five year requirement should be based on 492 dwellings per year.

Q.4.20. Does the housing trajectory (Appendix A) and associated evidence demonstrate that the Plan will be effective in helping to ensure that there will be a supply of specific deliverable sites sufficient to meet an appropriately calculated five year requirement when the Plan is adopted and thereafter?

As set out in our response to question 4.14, we believe in the later years of the Plan, the council may not be able to demonstrate a five-year supply at all times.

Policy H1: if a five year supply cannot be demonstrated

Q.4.21. 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?

We do not believe the approach is justified or provides clarity on the type of sites that would be supported in such a circumstance. In particular the reference to being 'well related' to the development limits of the urban area is not properly defined.

Banks Property believe that further consideration should be given to a stand-alone policy that sits outwith Policy H1 should a five year supply not be able to be demonstrated. Such an approach would enable a more detailed policy to be set out providing clarity on sites that may be supported in such a circumstance.

J Seabury
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