

## Response to Inspector's Matters Issues & Questions on Darlington Local Plan

### Matter 4 – Housing development

**Q 4.1, 4.2 and 4.14** – With so many sites allocated, I have no doubt that there is a reasonable prospect of this number of homes being built \*depending on the conditions in the regional and local housing market\* - this Local Plan allocates so much housing, 2.5 times in excess of the OAN figure, that it will be incredibly dependent on market conditions, with many of the impacts of coronavirus and Brexit (particularly the end of the furlough scheme) still yet to be felt. This cannot but affect the housing market as people will be less able to afford to buy a home, or where they do, they may choose a slightly smaller and more affordable one over a larger luxury “executive-type” home, so the types of property built may need to change to reflect these changing circumstances. Obviously, developers will delay building if they do not think that their product will sell at the rate it is being completed.

In the case of a market slow-down, setting a much higher “exceptional” housing need figure than is defined by the OAN, would leave the council hamstrung: the council will be blamed for the under-delivery, even if it is due to developers slowing construction rates due to the housing market. DBC will therefore be “forced” to give planning permission in even less suitable areas that it does not wish to see developed, if as a result of this over-calculation it cannot then demonstrate a 5-year supply. Darlington has been here before, and we should not set ourselves up to fail in such a way again, which this Plan does. I would argue that for this reason the Plan ineffective and unsound until completion rates are revised down to meet actual need only.

**Q 4.3** – Absolutely not! As per Darlington Green Party's commissioned report<sup>1</sup> on the Draft Local Plan (particularly p.9-13), firstly the number of new homes needed was calculated using misleading methods including double-counting and taking aspirations as fact, instead of using the standard methodology. If the OAN were used, already permitted developments would supply all but 8 of the required number of homes for the period of the plan (and the outstanding 8 should easily be covered by windfalls), so no additional sites need to be allocated. Following on, the criteria for site allocation are not clearly described (so cannot be justified). National guidance states that housing should be located by preference on previously developed sites within the existing urban area, and close to shops and services. The Climate Change Act 2008 also requires a demonstration of how the development will aid reducing the town's carbon emissions to aid meeting the national target of a 78% reduction by 2035 – within the period of this Local Plan – and to net zero carbon by 2050. These allocations do not achieve either of these requirements being mainly greenfield, distant from existing communities and services, and so requiring a car-dependent lifestyle.

No sequential hierarchy of allocation criteria appears to have been created, nor robust explanation and evidence as to why brownfield sites within the urban area have been discounted / not allocated. The methodology appears to have been to identify where there is “easy” land that has even a vague possibility of being used for building (with no ecological or historical assessment to see what the impact of this would be, and therefore if this is really possible / true), and to allocate it all. It seems apparent that developers have told DBC that sequentially allocating brownfield sites first is unviable / undeliverable. Instead of countering this, and seeking out best practise and evidence of well insulated car-free / low car town-centre developments of flats, townhouses and small bungalows, DBC appear to have rolled over and allocated only greenfield sites. Their vast land take, disproportionate impact on biodiversity, flooding, loss of valued green infrastructure used by local people, the impact on the cost and carbon emissions to eventual residents of having to run a car, or suffering reduced life chances, and so building in loneliness - contrary to the Healthy New Towns principles – is unforgivable, and renders the plan unsound.

Development also appears to have been located so as to use developer contributions to build multiple “link-roads” and other road “improvements” (to speed vehicle movements, rendering the roads less safe)!

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<sup>1</sup> <https://drive.google.com/file/d/1LdMSST6j9dulUzn2VEXqhZcjr004A2iK/view?usp=sharing>

The NPPF specifically states that new developments should NOT build in car dependence, but this conflicts strongly with what is seen in this Plan. As central government focusses more on active transport, developer contributions should instead be used to redevelop existing main roads from a development to the town centre and nearby shops and services, into sustainable transport corridors, by reallocation of road space to active and public transport, a design to reduce vehicle miles travelled within the town. To meet this end, sites should be selected so that residents at a distance (ideally 15-20 mins walk) where they can easily walk or cycle to meet their daily needs for food, schools, employment, healthcare etc. This requires identifying sites close to the town centre, or the local or district centres, with cohesive routes to access them. This has not been done. Dense development is shown to be best in order to support shops and services, and viable public transport routes, yet all sites are allocated at very low densities – business as usual rather than any improvement in community design and placemaking.

Darlington's demographics show an aging population, living in smaller family groups, hence a need for more smaller properties, some of which should be suitable for the less mobile or disabled. The types of homes proposed in the allocations are unsuitable to meeting this need. As it is a requirement of a Local Plan to demonstrate how it meets the demographic needs of the town, this Plan fails so is unsound.

Some out-of-town development will be required to meet assessed housing need in the service and other rural villages. However, 2 villages have Neighbourhood Plans which are complete, or have demonstrated evidence of local housing need. These show much lower numbers of homes needed as have been allocated e.g. 23 properties needed in Low Coniscliffe & Merrybent, yet the Coniscliffe allocation includes over 1000 homes. This is disproportionate over-development in rural wards, supports urban sprawl and the joining up of the villages with each other and the urban area of Darlington – the antithesis of good modern planning!

**Q 4.4** – No, large sites are called “strategic” whilst small sites are not. Whilst it is evident that larger sites will have greater impacts, this definition is not useful or effective. The definition of strategic is fitting within an overall strategy for the town. As raised in Q4.3, it appears that the strategy is (orbital and link-)road-building and if that were the case, then those developments with sections of orbital road passing through them should be defined as strategic since they are required to contribute to a broader aim of transport in the town. I would however strongly disagree with this perceived strategy, and instead believing that the strategy should be sustainable development i.e. to meet the needs of the residents of the town, improving their quality of life, regenerating those areas which need it AND reducing the environmental and climate emissions impact of the town. Such an aim would lead to strategic allocations in regeneration sites, the Town Centre Fringe, key “demonstrator” sites of highly insulated (Passivhaus) low carbon and low-car communities, and low-carbon industrial sites (perhaps a manufacturer of prefabricated low-carbon homes). Since the NPPF states that it presumes in favour of \*sustainable\* development, this strategy and Plan is unsustainable and hence unsound.

**Q 4.5** – No, Skerningham is unsuitable for such a large greenfield development: it is not easily accessible via sustainable transport as an edge-of-town site without an arterial route into town to serve it. Described as a local nature reserve, it should never have been considered for encroachment upon by anything more than a few small pockets of housing development. Others have covered the ecology of the site<sup>2</sup>, which is home to many red and amber-listed species; described as the Jewel in the Crown of Darlington's countryside and wildlife sites; and “significantly tranquil” being away from major roads and homes. The River Skerne can break its banks safely here – building here would damage the area's flood alleviation role, increasing flood risk downstream. The local community were not engaged in the masterplanning and do not support this development, having crowdfunded a mini-documentary about their campaign to stop it<sup>3</sup>. It is unsustainable and damaging and this allocation should be removed from the Plan (or hugely reduced) to make it sound.

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<sup>2</sup> <https://drive.google.com/file/d/1r1TEPAOS7Wajtii3tS329VVbTSQsgxWK/view?usp=sharing>

<sup>3</sup> <https://www.youtube.com/watch?v=e12GY0dkYYg>

**Q 4.6** — The local community will fight development on this site at every opportunity, so this could cause delivery of completed dwellings upon it to be delayed. Also, evidence has been presented that the “landowner” does not in fact own some of the land they claimed in the Skerningham Garden Community bid to MHCLG, and given that the current owner (the golf course) do not wish to sell, this would severely impact on the viability of the whole site, as well as limiting or slowing delivery.

**Q 4.7** – The Greater Faverdale site is another out-of-town greenfield urban sprawl and car-dependent development. Distant and hence far less accessible from the town centre via sustainable transport means, it allocates more land for employment purposes when existing employment allocations remain unused. It has the potential to have greater sustainability than Skerningham if a station were built for the Bishop Auckland line railway, to allow easy commuting into the town centre by train, however this seems unlikely, plus it is closer to those areas indicated for employment so wouldn't be within walking distance of commuters' homes.

**Q 4.10** – Excess numbers of homes allocated to this site compared to local need – it clearly does not take into account the completed Neighbourhood Plan developed by Low Coniscliffe & Merrybent Parish Council. If such documents are ignored in the Local Plan process, communities wonder what the point was of the effort and expense of developing them.

This site does not need to be allocated due to more than the OAN housing numbers already being permitted. It is an out-of-town greenfield site, currently agricultural fields. It is cut off from the existing urban area by the Baydale Beck so only limited opportunities for walking and cycling to the local centre of Mowden shops would be possible, and there is not an easy / contiguous route – most residents would therefore be car-dependent. The site also contains part of the “orbital road” which I disagree is necessary – Darlington must seek to reduce motor vehicle numbers. Building new roads is proven to induce extra demand which worsens car dependency and congestion within a few years of completion. Ring roads also facilitate further urban sprawl in future. The site is therefore excess to requirements and unsustainable development, so renders the Plan unsound.

**Q 4.11** – As for all other sites, this is surplus to OAN requirements and is not needed. This site is an edge of town greenfield development that is affected by flooding, road noise, is cut off from the existing urban area and it contains other heritage and infrastructure constraints. If it were to be built upon significant buffer zones and tree planting would be required to protect residents' amenity therefore only a small part of the site could be built upon. It should be removed to render the Plan sound.

**Q 4.12** – Middleton St. George (MSG) specifically excluded this site from its Neighbourhood Plan since it is surplus to requirements. Other already-permitted developments have significantly changed / damaged the character of the village, and there is no justification for this site to be allocated. Allocations in this Plan would add 906 homes in MSG, far exceeding the local housing need of 136 houses from the Neighbourhood Plan (recently submitted to the council, but the housing need evidence base was public), which again appears not to have been taken into account. This is disproportionate development: housing allocations should be better spread across the Borough, and located preferentially within the main urban area of Darlington. MSG has already taken more than its fair share of new housing over recent years. It is a village with limited bus service, and whilst it has a cycle path into town along the old Darlington to Stockton Railway trackbed, this is more a leisure than a commuter route – it does not have a tarmac surface, and is not gritted, nor lit so would not be deemed safely useable at night, and in winter. MSG does have a train station with trains approx. every 20-30 mins at peak times east towards Thornaby, Middlesbrough etc., or Darlington and Bishop Auckland to the west. Significant investment must be made to improve sustainable transport options for MSG's hundreds of new residents, such as replacements for old Pacer trains to make train travel desirable, however this can only ever serve limited points. Cycle and train combinations should be enabled. Until such investment is made, no further development should be permitted in MSG with its already overstretched services, and its mainly car-dependent residents.

**Q 4.13** – This allocation is unnecessary, and would negatively impact on the setting of the Blackwell Grange parkland. This corner of the site would suffer road noise from the busy Blands Corner roundabout.

**Q 4.16** – 600 is a very conservative estimate for windfalls given that an average of 135 windfall permissions were granted each year since the Plan's earlier drafts. Even using c. half that, as a conservative estimate, of 75 properties per year, would result in 1125 homes as windfalls over the remaining 15 years of the plan. This calculation should therefore be increased to take account of recent evidence of "unplanned" sites coming forward for development, which is likely to increase as companies relocate or go out of business due to the impacts of Brexit and coronavirus.

**Q 4.17** – The allocations (6709), commitments (2652) and years 1-4 completions (1804) deliver 11,165 homes. This should be increased by 400 to take account of small site windfalls identified in the trajectory but excluded from the commitments in table 6.4.

The buildout (post 2036) of 5,545 (table 6.3) is from allocated sites and does not include 360 post-2036 dwellings at West Park (committed site 68 - see the trajectory table A1). Taking this into consideration the plan has sufficient capacity for 17,470 homes. To this should be added permissions granted (110 to date) since the submission plan was prepared and the contribution from larger site windfalls for the remaining period of the plan. The total could well approach 20,000.

This is a vast number, and is a completely unjustified amount of housing. Whether such a huge amount of growth (and urban sprawl) of the town is beneficial for the local economy, quality of life, council-tax take / viability of the council or its "innovative investment partnerships" with home-builders has never been decided democratically – the community has not been enabled to have input into that decision. Since perpetual growth (at all costs, as many allocations on land which should never have been allocated for development shows) is the ideology of the cancer cell – Darlington must instead plan for sustainable development to improve its local economy and quality of life without such excess growth, as it is not necessary to the success of the town, and would damage it. The danger is not insufficient land allocation, but excess, resulting in lack of control by the council, half-built estates, or dereliction of older less desirable areas of the town in favour of new estates, worsening the existing doughnut of deprivation. We can and must plan for better than this!

**Q 4.18** – No, the OAN figures should be used which more accurately project the housing need of the town. If small additions for additional jobs delivered are required then these can be added at a subsequent 5-year review (and potential sites could be earmarked but for release for development only if necessary). As discussed above (Q4.3), in the case of a market slow-down, setting a much higher "exceptional" housing need figure than is defined by the OAN, would leave the council hamstrung: the council will be blamed for the under-delivery, even if it is due to developers slowing construction rates due to the housing market. DBC would then therefore be "forced" to give planning permission in even less suitable areas that it does not wish to see developed, if as a result of this over-calculation it cannot then demonstrate a 5-year supply. Darlington has been here before, and we should not set ourselves up to fail in such a way again, which this Plan does. I would argue that for this reason the Plan is ineffective and unsound until the dwellings per year rate is revised down to meet actual need only as calculated by the standard methodology.

**Q 4.19** – The minimum 5-year housing requirement should always be set using the OAN level, a target of a higher figure could be set if desired. But requiring delivery over and above actual need is unsustainable, will be unsustainable for the local housing market (it is already static with prices relatively low and declining, and residents struggling to sell homes if they need to move), and if there is a national slow-down as is predicted, the council would again be subject to "malicious" planning applications for development in sites it would not wish to see developed but cannot afford to refuse.

**Q 4.22 and Q 4.23** – It should be ensured that large sites allocate areas for self-build. As this plan allocates mainly vast sites, this makes it hard if not impossible to deliver 10% of homes on such smaller sites. Smaller

Bryony Holroyd (Representor no. 1173970)

housing allocations should therefore be made, prioritising brownfield sites, to better match Darlington's actual need, and to allow this policy to be met, and hence to make the Plan sound.