

Comment

Agent	Miss Rachel Flounders (1246879)
Email Address	[REDACTED]
Company / Organisation	ID Planning
Address	[REDACTED] [REDACTED] [REDACTED]
Consultee	Hallam Land Management (1250905)
Address	N/A N/A N/A
Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Hallam Land Management (1250905)
Comment ID	DBLPMod590
Response Date	25/11/21 14:23
Status	Processed
Submission Type	Email
Version	0.6
Question 1	
Which document/modification does this representation relate to?	Main Modification Schedule *
* Please provide the reference number (where applicable), for example MM1, PM1, MIN1	MM25
Question 2	
What best describes the nature of your representation?	Support
Question 3 Legally Compliant and Sound	
Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?	Yes
Do you consider the Plan, incorporating the proposed Modification is Sound?	Yes

Question 4

Please give details of why you consider the Darlington Local Plan, incorporating the proposed Modifications to which your representation relates, is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the Plan or comment on the Sustainability Appraisal Report Addendum/Habitats Regulations Screening please also use this box to set out your comments.

This modification proposes a single housing requirement figure of 4,492 dwellings per annum (9,840 dwellings over the plan period) rather than a range. This modification also alters the text in relation to situations where a 5 year supply cannot be demonstrated and states that sites beyond development limits that are well related to 'the built form' will be supported. The wording previously referred to sites being well related to the development limits.

We support both the changes in this modification which reflect changes we requested in our written representations to the plan and at the examination hearings.

This proposed modification (MM25) addresses our soundness concerns in relation to Policy H1 (Housing Requirement). However, there are still soundness issues which the main modifications do not address in relation to the adequacy of the housing land supply to meet the identified requirement. Please see our separate response in relation to MM6 / 29 / 30 / 33 / 37 (which relates to the housing supply over the plan period and in the first five years). It remains our case that additional allocations are required to make the plan sound and that Hallam Land Management Ltd's site at Hurworth should be allocated to support delivery in the early years of the plan.

Question 5

Please set out what changes you consider necessary to make the Plan legally compliant or sound and why, thinking about what you identified in Question 4. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.

N/A

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Comment ID	DBLPMod591
Response Date	25/11/21 14:23
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Submission Type	Email
Version	0.5
Question 1	
Which document/modification does this representation relate to?	Main Modification Schedule *
* Please provide the reference number (where applicable), for example MM1, PM1, MIN1	MM29
Question 2	
What best describes the nature of your representation?	Object
Question 4	

Please give details of why you consider the Darlington Local Plan, incorporating the proposed Modifications to which your representation relates, is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the Plan or comment on the Sustainability Appraisal Report Addendum/Habitats Regulations Screening please also use this box to set out your comments.

This modification states *'there is a need to allocate sufficient land to accommodate a minimum of 9,840 dwellings within the plan period'*. This wording should be altered to reflect MM6 which acknowledges that some of the identified need has been delivered through recent completions and in the short term through existing commitments. MM6 states *'that land is allocated for approximately 5,764 homes with an additional 5,440 (approx..) already committed via existing planning permission or completed over the first five years'*. This could be interpreted that the Council has not allocated sufficient land. For clarity, MM29 should clearly identify the number of new allocations needed taking into account net completions and existing commitments.

Question 5

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The plan should identify additional smaller allocations that can be delivered in the short term to ensure the Council has a robust 5 year housing land supply in the early years of the plan given the large allocations will start delivering a meaningful quantum of dwellings until later in the plan period.

My client's site to the west of Roundhill Road in Hurworth is a suitable site for allocation and was assessed as being suitable, available and achievable in the Council's HELAA. The site is well related to the built extent of Hurworth with residential development to the east and south of the site. Hurworth is a Service Village where growth is supported in principle but no new allocations are proposed. The allocation of this site would therefore assist in supporting its role and function. The site is deliverable in the short term and the allocation of this site would assist the Council in being able to demonstrate a more robust five year housing land supply.

The following amendment to Policy H2 (Housing Allocations) is therefore sought to make the Plan sound:-

Policy H2

Villages - Land to the West of Roundhill Road, Hurworth – Site ref: 335 – site area 12.6ha – 355 dwellings

Comment

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Address	N/A N/A N/A
Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Hallam Land Management (1250905)
Comment ID	DBLPMod593
Response Date	25/11/21 14:23
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Version	0.4
Question 1	
Which document/modification does this representation relate to?	Main Modification Schedule *
* Please provide the reference number (where applicable), for example MM1, PM1, MIN1	MM30
Question 2	
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Question 4	

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This modification states that 'the allocations and existing commitments have the potential to deliver 8,883 homes'. Again, this appears to conflict with MM29 which states there is a need to allocate sufficient land to accommodate a minimum of 9,840 dwellings over the plan period. MM30 also states that the plan has sufficient land for approximately 14,836 dwellings yet MM37 identifies a total supply of 11,579 dwellings over the plan period. It should be made clear that the 14,836 dwelling figures includes dwellings that are expected to be delivered beyond the plan period.

For clarity, MM6, MM30 and MM37 should reflect the information set out in MM37.

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Comment by	Hallam Land Management (1250905)
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Version	0.4
Question 1	
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MM37 identifies the main sources of the Council's supply which is based on the following:-• Net completions since the start of the plan period – 2321 dwellings• Existing commitments – 3119 dwellings• Allocations – 5,764 dwellings• Small sites allowance – 375 dwellings• Total Supply – 11,579 dwellings.

For clarity, MM6, MM30 and MM37 should reflect the information set out in MM37.

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Event Name	Local Plan 2016-2036 Proposed Modifications
Comment by	Hallam Land Management (1250905)
Comment ID	DBLPMod595
Response Date	25/11/21 14:23
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Submission Type	Email
Version	0.8
Question 1	
Which document/modification does this representation relate to?	Main Modification Schedule *
* Please provide the reference number (where applicable), for example MM1, PM1, MIN1	MM6
Question 2	
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Comment by	Hallam Land Management (1250905)
Comment ID	DBLPMod596
Response Date	25/11/21 14:23
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Version	0.9
Question 1	
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* Please provide the reference number (where applicable), for example MM1, PM1, MIN1	MM33
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Marginal 5 Year Housing Land Supply Position

MM33 – This modification states that at this point in time the Council can demonstrate a 5.3 year housing land supply. This is a marginal housing supply position for a plan with new allocations that is due to be adopted in the very near future. It raises concerns regarding the delivery of the housing requirement in the early years of the plan, particularly when the Council have included within this supply 760 dwellings which only have outline planning permission and 1,125 dwellings on allocations without any planning permission. The total 5 year supply is stated to be 2,920 dwellings and therefore 1,885 dwellings (65%) are on sites which are not classed as deliverable (as defined in the NPPF) and requires the Council to demonstrate clear evidence that housing completions will begin on site within 5 years.

In addition, the Council have only included 910 dwellings from its existing commitments in their 5 year supply, despite there being 3,119 dwellings which comprise existing commitments in the total supply. As these are sites with detailed permission in place and which the NPPF considers to be deliverable by definition, it would be expected that existing commitments would make up a greater proportion of the 5 year supply. It is therefore questioned why the Council is only expecting 29% of existing commitments will be delivered in the next five years. It raises concerns that the Council is relying on commitments as part of their housing supply which they do not expect to come forward in the short term and which may not come forward before those permissions expire.

Plan Will Not be Effective in Delivering the Identified Housing Need

Based on the new single requirement figure proposed (MM25) and the information presented in relation to the 5 year housing land supply and components of the total supply (MM33) we maintain the plan will not be effective in delivering the identified housing need for Darlington. We have raised concerns at each stage of the plan preparation process that the plan is too reliant on a small number of large allocations which are all located around the edge of Darlington. It remains our case that the plan will not be effective in delivering the identified housing requirement. The marginal 5 year housing land supply position, the reliance on a large quantum of commitments as part of the Council's overall supply which the Council do not expect to be delivered in the first five years and the strategy to identify a small number of large allocations presents a high risk that the identified need will not be met and that a 5 year supply will not be maintained throughout the plan period given the time lag that is expected in completions commencing on the large allocation sites.

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