

## Comment

<b>Agent</b>	Mr Andrew Moss (1168351)
<b>Email Address</b>	
<b>Company / Organisation</b>	
<b>Address</b>	
<b>Consultee</b>	Mr Nigel Swinbank (1168369)
<b>Address</b>	Cold Comfort Farm Neasham Darlington DL2 1PG
<b>Event Name</b>	Local Plan 2016-2036 Proposed Modifications
<b>Comment by</b>	Mr Nigel Swinbank (1168369)
<b>Comment ID</b>	DBLPMod473
<b>Response Date</b>	29/11/21 10:31
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Question 1</b>	
<b>Which document/modification does this representation relate to?</b>	Main Modification Schedule *
<b>* Please provide the reference number (where applicable), for example MM1, PM1, MIN1</b>	MM176
<b>Question 2</b>	
<b>What best describes the nature of your representation?</b>	Object
<b>Question 3 Legally Compliant and Sound</b>	
<b>Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?</b>	Yes

**Do you consider the Plan, incorporating the proposed Modification is Sound?**

No

**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.**

The definition of 'Entry-level exception sites' in the glossary should reference paragraph 72 in the NPPF, not paragraph 71.

**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.**

Amend the definition of 'Entry-level exception sites' to reference NPPF paragraph 72.

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<b>Event Name</b>	Local Plan 2016-2036 Proposed Modifications
<b>Comment by</b>	Mr Nigel Swinbank (1168369)
<b>Comment ID</b>	DBLPMo474
<b>Response Date</b>	29/11/21 10:33
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.3
<b>Question 1</b>	
<b>Which document/modification does this representation relate to?</b>	Main Modification Schedule *
<b>* Please provide the reference number (where applicable), for example MM1, PM1, MIN1</b>	MM46
<b>Question 2</b>	
<b>What best describes the nature of your representation?</b>	Object
<b>Question 3 Legally Compliant and Sound</b>	
<b>Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?</b>	Yes

**Do you consider the Plan, incorporating the proposed Modification is Sound?**

No

#### **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.**

In principle support the inclusion of an Entry Level Exception Site policy in the Plan. Support additionally the reference in criterion (b) to 'one or more types of affordable housing types'.

In turn support the inclusion of a definition of Entry Level Exception Site in the Glossary of the Plan.

Object that there is a need for the viability of the policy to be demonstrated such that the deliverability of the policy can be evidenced including in relation to the delivery of entry level exception homes for purchase, entry level exception homes for rent and a combination of the two. This evidence needs to include an assessment of the resulting land values for entry level exception site developments, land being a necessary element of entry level affordable housing as it with all housing. The concern is whether without cross subsidy from open market housing, schemes will be viable and deliverable.

A further objection is submitted that there should be an additional criterion broadly reflecting the last paragraph in the Rural Exception Sites part of the policy. For discussion purposes the following is proposed, *"In exceptional circumstances, a small proportion of market or self /custom build housing may be provided, if it can be demonstrated via a detailed viability assessment that a 100% entry level affordable housing scheme would be unviable and the market homes would support delivery"*. The reason for including this wording is comparable to the reason for including it in the first part of the policy.

#### **Question 5**

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Demonstrate the policy will deliver schemes which are viable and deliverable.

Include an additional criterion, *"In exceptional circumstances, a small proportion of market or self /custom build housing may be provided, if it can be demonstrated via a detailed viability assessment that a 100% entry level affordable housing scheme would be unviable and the market homes would support delivery"*.

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<b>Event Name</b>	Local Plan 2016-2036 Proposed Modifications
<b>Comment by</b>	Mr Nigel Swinbank (1168369)
<b>Comment ID</b>	DBLPMod475
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<b>Question 1</b>	
<b>Which document/modification does this representation relate to?</b>	Main Modification Schedule *
<b>* Please provide the reference number (where applicable), for example MM1, PM1, MIN1</b>	MM47 para 6.6.4
<b>Question 2</b>	
<b>What best describes the nature of your representation?</b>	Object
<b>Question 3 Legally Compliant and Sound</b>	
<b>Do you consider the Plan, incorporating the proposed Modification is Legally Compliant?</b>	Yes

**Do you consider the Plan, incorporating the proposed Modification is Sound?**

No

#### **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.**

*Object to the words 'it is expected that entry level scheme will consist of more than one type of affordable housing'. This is inconsistent with the new criterion b proposed in MM46 which refers to 'one or more types of affordable housing'.*

#### **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.**

*Amend the second sentence in 6.6.4 to state 'It is expected that entry level schemes will consist of one or more types of affordable housing'. In the alternative delete the sentence arguably it not being necessary.*