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Sent by email only

Dear Sir / Madam,

Darlington Local Plan 2016 – 2036: Issues and Scoping

1. Thank you for consulting with the Home Builders Federation (HBF) on the Local Plan: Issues and scoping consultation.
2. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.
3. The HBF is supportive of the Council embarking upon a new local plan and is pleased to acknowledge the positive engagement which has already occurred with the house building industry. The HBF is keen to work with the Council to ensure that a sound plan, which assists the Council in meeting its growth objectives, can be produced. In this regard we would welcome further engagement in the production of the plan.
4. The following brief comments are provided to assist the Council in producing the plan. A more detailed analysis of the plan and its policies will be provided at later stages of consultation.

Q1: Is the period up to 2036 the right period for the new Local Plan? If not, what do you suggest, and why?

5. Yes, an end date of 2036 is considered appropriate. This provides a 20 year period for the plan which should provide sufficient scope to meet the plans long term vision, aims and objectives. This time period will also provide certainty for the development

industry and residents alike and conforms to the NPPF preference for plans to have at least a 15 year time horizon post adoption.

6. The start date of 2016 conflicts with the evidence upon housing need contained within the 2015 Strategic Housing Market Assessment (SHMA). The SHMA considers the housing need over the period 2011 to 2036, the Council will need to provide clear reasoning as to why the plan start date does not match the Council's evidence base.
7. It is also recommended that the plan include clear trigger points which would instigate a full or partial plan review, should remedial action be required. In terms of housing this could include the lack of a five year housing land supply, a significant deviation below the housing trajectory or a meaningful change in housing need over the plan period.

Q2: Do you agree with the range of matters that we propose to cover in the new Local Plan? Is anything missing?

8. The range of matters identified are considered appropriate.

Q3: Is this vision still the right one? If not, how should it be changed?

9. The existing Core Strategy vision provides a useful starting point for developing an updated spatial vision for the area. This could be improved by including greater references to the growth of the economy and meeting the housing needs of current and future residents.
10. Greater clarity would also be added by providing a spatial dimension to the vision which sets out, in general terms, the level and location of growth across the area. This could include reference to the anticipated role of Darlington within the wider sub-region as well as the supporting roles of the borough's smaller settlements. If the plan is to include strategic areas of growth, as suggested, these could also be identified.

Q4: Are the aims and objectives linked to this vision still the right ones, and should any be prioritised?

11. The Core Strategy aims and objectives are generally considered to remain appropriate. It is, however, worth considering these in light of the significant investment potential within the area as set out within the Tees Valley Unlimited

Strategic Economic Plan and building upon the successful investment that has, and is, already taking place within Darlington.

Q5: Are the issues highlighted in the documents the right ones?

12. In terms of the local plan the principle interests of the HBF are those of housing need and delivery. Our response therefore focuses upon the consultation documents which directly relate to these issues.

Economic Growth

13. The HBF is supportive of the Council providing a positive economic strategy for the plan. This needs to be aligned with housing growth. It is also important that the economic growth identified supports the ambitions of Tees Valley Unlimited as well as the Government's aspirations for a Northern Powerhouse. In this regard the former Prime Minister and Chancellor set out a *Long Term Economic Plan for the North East* which included ambitions to;

"...raise the long term growth rate of the North East to at least the forecast long term growth rate of the whole UK by building a Northern Powerhouse – adding an extra £6 billion to the North East economy in real terms by 2030, equivalent to over £2,000 per person..." and

"...create 50,000 new jobs in the North East by backing the core strengths of the local economy like chemical innovation and exports..."

14. Whilst Darlington is not the largest economy within the North East it is strategically located to assist in delivering these ambitions.

15. It should also be noted that housing, alongside its social benefits, also contributes significantly to the wider local economy. The HBF has produced a series of papers which consider the economic impact of housing, nationally, regionally and locally. These can be accessed via the HBF website (www.hbf.co.uk).

New Development – Housing

16. The HBF support the fact that the Council is aiming to achieve an ambitious housing growth strategy which not only takes account of need but also economic growth and previous delivery failings. The suggested plan housing requirement of approximately 10,000 new dwellings over the 20 years of the plan (2016 to 2036) is based upon the 2015 SHMA.

17. The HBF has not, at this stage, undertaken a detailed analysis of the SHMA or its assumptions and we will provide more detailed comments as the plan progresses. The SHMA does, however, appear to be based upon a recognised methodology and concludes that around 11,160 dwellings are required over the period 2011 to 2036. It is understood that the under-delivery from the period 2011 to 2016 has been spread over the plan period (2016 to 2036) to provide a proposed plan housing requirement of approximately 500 dwellings per annum.
18. Whilst the HBF is supportive of the Council providing a housing requirement which is greater than recent requirements and delivery levels the reason for not aligning the plan period with the evidence base (2011 to 2036) will need to be clearly explained and justified. The methodology employed regarding this backlog does seem at odds with the Planning Practice Guidance (ID 3-035).
19. It is notable that the proposed plan requirement is unlikely to meet the annual need for affordable housing, 165 units per annum. As such the Council should consider whether an uplift is required to ensure that the full objectively assessed needs of both market and affordable housing are met.

Local Place Making – Types of Housing

20. The document places significant emphasis upon masterplanning. Whilst this can be a useful tool it is important that the approach taken is proportionate to the size and scale of the development. If undertaken correctly masterplanning can add significant value to a development and assist developers to successfully negotiate the planning application process. It is vitally important that the Council work closely with the promoters and developers of sites to ensure that any masterplanning work is not overly prescriptive and does not become a barrier to development.
21. The HBF agrees that a comprehensive review of the Core Strategy policies in relation to meeting local needs is required. The evidence contained within the Council's 2015 SHMA appears to provide a useful starting point for consideration of the types of housing required.
22. It is, however, recommended that the SHMA evidence is not applied rigidly to every site and rather is used as a generic guide for the whole plan area. This is because the SHMA provides a snap-shot in time and does not take into account changes in the economy and market or the aspirations of buyers. Furthermore the types of housing provided should be catered towards the needs of the localised

area in which the development is taking place as well as market demand and site characteristics.

New Development – Renewable Energy and Energy Efficiency

23. The HBF agrees that a full review of the Core Strategy policies is required to take account of the shift in how energy efficiency improvements in new development will be secured, away from the planning system to the building regulations regime.

Managing Development

24. To ensure that the plan facilitates appropriate development it is important that it does not place undue burdens or artificial barriers upon development. The HBF does not generally support a phased approach to the housing requirement or site release without strong supporting evidence to justify such approaches.

Q6: Are there any others that we should consider?

25. Yes, whilst briefly alluded to in a number of the documents, most notably 'Making Choices', the economic viability of the plan and the cumulative burden its policies and obligations place upon development will be a key consideration. This will impact both on delivery overall as well as the type and range of sites which can be delivered. In this regard the industry can provide significant expertise in order to ensure that the evidence upon which the plan is founded is credible and robust. It is therefore recommended that the Council seek to engage the industry, as early as possible, in this important element of the evidence base and plan preparation.

26. The documents also fail to mention any cross-boundary issues with neighbouring authorities. The Council will need to give careful consideration to what issues exist and whether actions are required within the plan to address the identified issues. It is notable that the 'Potential Locations for Strategic Development' map indicates potential importing / exporting of housing need. This would need to be clearly evidenced and justified through the duty to co-operate.

Q7: Are there any issues or themes for which you think we have not identified the right 'starting point' material for developing new policies?

27. I refer to our response to question 5 above.

Q8: Is there any further research that you think is needed before new policies can be developed?

28. It is considered that there is sufficient evidence in place to begin to formulate new policies now. It is, however, important that the evolving plan reacts to new or updated evidence as it is provided. A key element will be further evidence upon delivery and the viability implications of proposed policies and obligations. As noted in our response to other questions the HBF is keen that our members are actively engaged in the development of the evidence base.

Q9: Do you particularly support or object to any of the potential strategic options for new housing identified?

29. The HBF does not wish to comment upon the merits or otherwise of the potential strategic options for growth. It is, however, important that the potential options be fully informed by an analysis of their deliverability and viability. This is equally relevant to the Growth Zones identified within the Core Strategy. It would not be appropriate to continue to promote these locations if there is little or no prospect of them being brought forward.

30. The HBF is keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which includes a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels. The Council will need to assess which of its potential options would provide the levels of delivery required. If the Council is to identify large strategic sites, these will inevitably require longer lead-in times for delivery which will need to be factored into the Council's assessment and housing trajectory. The HBF and our members can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue.

31. The HBF also strongly recommend that the plan allocates more sites than required to meet the housing requirement. This buffer should be sufficient to deal with any under-delivery which may occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible. It is also notable that the recent recommendations from the Local Plan Expert Group suggest a buffer of 20%, over the plan requirement, is needed.

Q10: Are there any other options that you can think of? If so, what is there to commend them?

32. The HBF has no further comments at this stage.

Further Consultations

33. I trust that the Council find the foregoing comments useful as it continues to prepare its Local Plan. I would be happy to discuss these comments further if required and assist the Council to continue its engagement with our members.
34. I would also like to be kept informed of future consultations upon the Local Plan or other planning documents.

Yours sincerely,

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