

## **DARLINGTON LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY EXAMINATION**

### **STRATEGIC HOUSING LOCATIONS SELECTION AND PHASING: METHODOLOGY STATEMENT**

**Prepared by Darlington Borough Council, 17th January 2011**

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#### **1. Introduction**

- 1.1 This statement sets out the process and methodology underpinning the identification of strategic locations for new housing development, the amount of housing each location will accommodate and when it should be brought forward. The outcome of this work is set out in Policies CS1 and CS10, and in the strategic housing locations options appraisal (SD003).
- 1.2 This statement has been prepared to inform the consideration of Matter 1.1. and 1.4 at the public hearing sessions of the Examination. It refers to consultations carried out during July/August 2009 that were omitted in error from the Council's previously submitted documents CD006 and CD012.

#### **2. Methodology**

- 2.1 In July 2009, the Council prepared a list of 16 potential criteria against which to assess potential strategic housing locations. Those criteria were drawn from a range of sources, such as national and regional planning documents, as well as criteria developed to respond to matters considered important in a local context.
- 2.2 Consultations<sup>1</sup> on the criteria, their relative importance and a suggested approach were carried out in July/August 2009. The consultation list was drawn from membership of the Council's Planning Forum and Darlington Partnership's Prosperous Darlington and Greener Darlington theme groups, the Darlington SHLAA steering group and people previously invited to a LDF housebuilder/ developer stakeholder workshop on 10th Feb 2009. The consultation was also advertised on the Council's website, and the local radio station (Alpha radio) ran an item about it on 28th July.
- 2.3 The consultation documentation also outlined the different amounts of development that would be assessed in each location. A copy of the consultation material is attached at **Appendix 1**.
- 2.4 23 consultation responses were received. Following consideration of the consultation responses, a more simplified approach to the assessment than originally suggested was undertaken. In particular, on contacting information providers, it became apparent that many were unable to provide specific information unless precise sites were identified. As a result, only generalised information was collected to answer each of the finalised criteria (as now appear in SD003). New information was received from key stakeholders on things like flood risk, HSE constraints, school places provision and agricultural land quality, and from recent work such as the Connections Study (SD039). This complemented an overview of the information that had previously been collected for the SHLAA sites in each broad location, and the separate sustainability appraisal (published alongside the Revised Preferred Options, CD022) that was carried out on each of the potential strategic locations. This ensured that the information collected for each location was comparable in nature and detail.

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These consultations were referred to in the Council's Cabinet report (Item 8(b) para. 12) on the revised LDF Core Strategy Preferred Options, 5th Jan 2010.

- 2.5 The broad locations identified encompassed most of the potential housing sites that had been assessed through the SHLAA or subsequently submitted as housing sites during the Preferred Options consultation. Eight broad locations were identified, based around groupings of SHLAA sites, and these are shown on the plan at **Appendix 2**, a version of which appeared as Figure 6.1 in the Revised Preferred Options document (p68, CD022); as far as possible, comparable sized groupings at the urban fringe were identified around radial routes, with each location containing more than one SHLAA site. The plans were intended to be indicative, rather than definitive. For example, the overview for Area F included consideration of data from SHLAA sites 14, 42, 51, 52 and 53 (see Appendix 3a of SD012), encompassing land both to the north and south of Staindrop Road, whilst the Eastern Urban Fringe location now being proposed was part of a wider North Eastern Urban Fringe area in the appraisal, albeit that the appraisal findings recognise the different attributes of land at the northern and southern end of the initial broad location.
- 2.6 Because information was generalised for the options appraisal, it was considered inappropriate to apply strict prioritisation according to performance against each criterion. An approach that was based on general qualitative and quantitative conclusions about each potential location was adopted instead, concentrating on the following differentiating factors:
- (a) making best use of existing, physical, social and community infrastructure;
  - (b) potential to meet identified local housing need and demand;
  - (c) accessibility to jobs, key services and facilities by public transport and non-car modes;
  - (d) potential to draw energy from renewable, decentralised or low carbon energy sources;
  - (e) ability to mitigate the environmental and social costs of development; and
  - (f) potential to create/contribute to a cohesive community
- 2.7 The outcome was the strategic housing options appraisal that appeared at Appendix 6 of the Revised Preferred Options document (CD002). The appraisal was subsequently updated to take account of new information provided during the Revised Preferred Options consultation and re-issued at the same time as the Publication Draft Core Strategy, as a stand-alone document (SD003).
- 2.8 The sequential approach of the Core Strategy's locational strategy underpinned derivation of the amount of housing that needed to be accommodated at each location. The assumptions made about the capacity of the Town Centre Fringe location were based on:
- the capacity of 'opportunity areas' identified in the Darlington Gateway Strategy (SD021);
  - assumptions about housing delivery that formed part of the evidence underpinning the Tees Valley Housing Growth Point bid, adjusted downwards to take account of the latest thinking about the future of this area emerging from discussions between the Council and key stakeholders; and
  - planning applications in the pipeline.
- 2.9 **Appendix 3** provides an example of the further detail behind this. The number of new dwellings proposed in the Core Strategy is at the bottom end of the capacity range indicated, so minimising the risk of non deliverability in the location as a whole if these (or other) sites do not come forward in the manner or at the time assumed.
- 2.10 The phasing of development in the Town Centre Fringe, which anticipates more than two-thirds taking place in the last five years of the plan period, also took account of the challenges that will be faced in delivering wholesale change in this area, e.g. further planning work, developing a comprehensive flood risk management plan, land assembly and possible relocation of a gasholder. It also needed to be phased so as not to undermine the regeneration of the adjacent Central Park area, a higher priority for delivery in the Core Strategy.

- 2.11 Information on suitable, available and deliverable/developable sites from the SHLAA (SD012) informed the total amount of new housing and its phasing in Darlington Urban Area.
- 2.12 The housing numbers apportioned to each of the urban fringe locations assumed that there would be more than two builders active in the North West Urban Fringe location and one developer active in the Eastern Urban Fringe, building out at 50 dwellings per annum. These build out rates are at or below the build out rates that the House Builders Federation advised local authorities to use in their letter dated 7th April 2008 (see **Appendix 4**).
- 2.13 The only other reasonable alternative considered to deliver the locational strategy for housing was locational phasing in the period 2021-2026 that took account of windfalls (as PPS3 para. 59 allows). This would have resulted in fewer strategic locations being identified and fewer dwellings allocated to each strategic location in that period. The Council's reasons for rejecting this approach are set out in para 3.5 of its housing numbers position statement (DBC002).

End

**Appendix 1: Consultation on the proposed criteria for assessing broad locations for potential new housing development**

DARLINGTON  
LOCAL DEVELOPMENT FRAMEWORK  
CORE STRATEGY



**Consultation on the proposed criteria for assessing broad locations for potential new housing development**

**RESPONSE FORM**

Consultation closes Monday 17th August 2009

E-mail to: [planning.policy@darlington.gov.uk](mailto:planning.policy@darlington.gov.uk)

Or Post to: Strategy Manager, Chief Executive's Department (Regeneration), Town Hall Darlington, DL1 5QT

**Local criteria**

The table overleaf shows the criteria that the Council is proposing to use to assess broad locations for potential new housing development. The essential criteria are ones that the Council has to take account of because of existing national or regional planning policy. This part of this consultation is about the local criteria.

1. Are the proposed **local** criteria the right ones for Darlington ? Yes / No (delete as applicable)
2. If no, please add your suggested additional criteria to the bottom of the table overleaf, and delete any criteria from the table that you do not think should be included.
3. Please give reasons for your suggested changes below, as it is unlikely that the criteria will be changed unless good reasons are given.

Criterion No. or Name	Reason for inclusion or deletion

**Relative importance of each criteria**

This part of the consultation is about all of the criteria. The table overleaf shows the Council's proposed order of importance for essential and local criteria.

4. Of all the criteria that you think are the right ones for the assessment, please indicate the numerical order of importance in which you would place the criteria.

(You can have more than one criterion in each position if you like, e.g. two criteria in first place, three criteria in second place, one in third place).

5. Please give reasons below where the order you suggest differs from the Council's proposed order.

	Type of criterion	Proposed Order of Importance	Your Suggested Order of Importance
1.	Essential	1=	
2.	Essential	2=	
3.	Essential	2=	
4.	Essential	3=	
5.	Essential	3=	
6.	Local	2=	
7.	Local	3=	
8.	Local	3=	
9.	Essential	1=	
10.	Essential	3=	
11.	Essential	1=	
12.	Local	1=	
13.	Local	1=	
14.	Local	1=	
15.	Local	3=	
16.	Local	2=	
		<b>Your suggested additional criteria</b>	

**Your Details**

Name	
Postal or E-mail address	
Company or organisation you represent	

*Thank you for taking part in this consultation.*

Any queries about this consultation, please e-mail [planning.policy@darlington.gov.uk](mailto:planning.policy@darlington.gov.uk) or tel:01325 388644.

# DARLINGTON LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY

## Proposed criteria for assessing broad locations for potential new housing development

	Type of criterion	USE OF RESOURCES
1.	Essential	Would housing development in this broad location make use of previously developed land and buildings?
2.	Essential	Would housing development in this broad location make the best use of existing physical infrastructure, or would additional infrastructure be needed ?
3.	Essential	Would housing development in this broad location make the best use of existing social and community infrastructure ?
4.	Essential	Would housing development in this broad location be able to readily and viably draw its energy from decentralised energy supply systems based on renewable and low carbon forms of energy supply, or is there clear potential for this to be realised ?
		<b>CONTRIBUTE TO HOUSING AND WIDER LDF OBJECTIVES (not covered elsewhere)</b>
5.	Essential	Are there potentially developable and marketable housing sites in this broad location ?
6.	Local	Could housing development in this broad location be of a type for which there is a current undersupply, or extend the range of the local housing offer ?
7.	Local	Would housing development in this broad location contribute to other planning and regeneration objectives ?
		<b>CONSTRAINTS</b>
8.	Local	Is any land in this broad location protected for nature or heritage conservation or recreational purposes?
9.	Essential	Does a high risk of flooding constrain development within this broad location ?
10.	Essential	Are there any other physical, environmental, land ownership, land use, investment constraints or risks associated with the land in this location which could make development in this broad location unviable or unachievable ?
		<b>ACCESSIBILITY</b>
11.	Essential	What type of broad location is it? <ul style="list-style-type: none"> <li>• Within the existing urban area?</li> <li>• Adjoining the urban area?</li> <li>• Within a settlement outside the urban area?</li> <li>• Adjoining a settlement outside the urban area?</li> </ul>
12.	Local	Is the broad location near to (within 800m of) an existing or planned public transport node?
13.	Local	Are at least three of the following community facilities within 400m walking distance of the broad location, or could they be provided as part of a new housing development? <ul style="list-style-type: none"> <li>• Convenience store/newsagent</li> <li>• Primary school</li> <li>• Pub/workingmen's club</li> <li>• Community centre.</li> <li>• Church or other place of worship.</li> </ul>
14.	Local	Is the broad location well related to places of work, or could it be made to be ?
		<b>BUILDING COMMUNITIES</b>
15.	Local	Would housing development in this broad location help to sustain a local community ?
16.	Local	Is the location, or could the broad location be well related to other homes?

**E-mail text**

**Darlington Local Development Framework  
CORE STRATEGY**

**CONSULTATION ON HOW THE COUNCIL IS PROPOSING TO ASSESS BROAD LOCATIONS FOR  
POTENTIAL NEW HOUSING DEVELOPMENT**

You are receiving this e-mail because you are a member of one of the key groups that the Council is working with in developing the new planning policies that will guide land use and development in the Borough over the next 15 years or so. The Council would like your views on this consultation, and will take account of all responses in finalising its new planning policies for Darlington.

This consultation follows on from previous work the Council has completed and consulted on. The Council published the Darlington Local Development Framework (LDF) Core Strategy Preferred Options in October 2008 (see [www.darlington.gov.uk/planningpolicy](http://www.darlington.gov.uk/planningpolicy) for more information about this and the LDF preparation programme in general), and intends to publish Revised Preferred Options in early 2010.

In response to comments received, further work is being done to understand which are the most appropriate broad locations for potential new housing development in the Borough, how much housing each should accommodate and when it should be delivered. Most of the new housing will not be required before 2021.

Sixteen criteria have been identified against which to assess potential broad locations for future housing, and it is these criteria that are the subject of this consultation. The proposed criteria are set out on the attached sheet, and a response form is also included.

The criteria are identified as essential or local. The essential criteria reflect requirements for the location of new development set out in national and regional planning policy documents. The local criteria are those that are considered important in a local context, e.g. because an issue is particularly important locally or there is a policy commitment to tackle it locally in other Council or partner plans and strategies, such as the Darlington Climate Change Strategy and Action Plan or the sustainable community strategy 'One Darlington, Perfectly Placed'.

The attached sheet also indicates the relative importance that the Council thinks each criterion should have in the assessment. It gives highest importance to sustainability and accessibility considerations, including potential 'showstoppers', e.g. areas at a high risk of flooding. Other planning considerations are given secondary importance and the lowest importance is given to factors that would not prevent housing development, but would be desirable results.

Once finalised, the criteria will be applied to different scales of potential housing in each broad location in the following ranges:

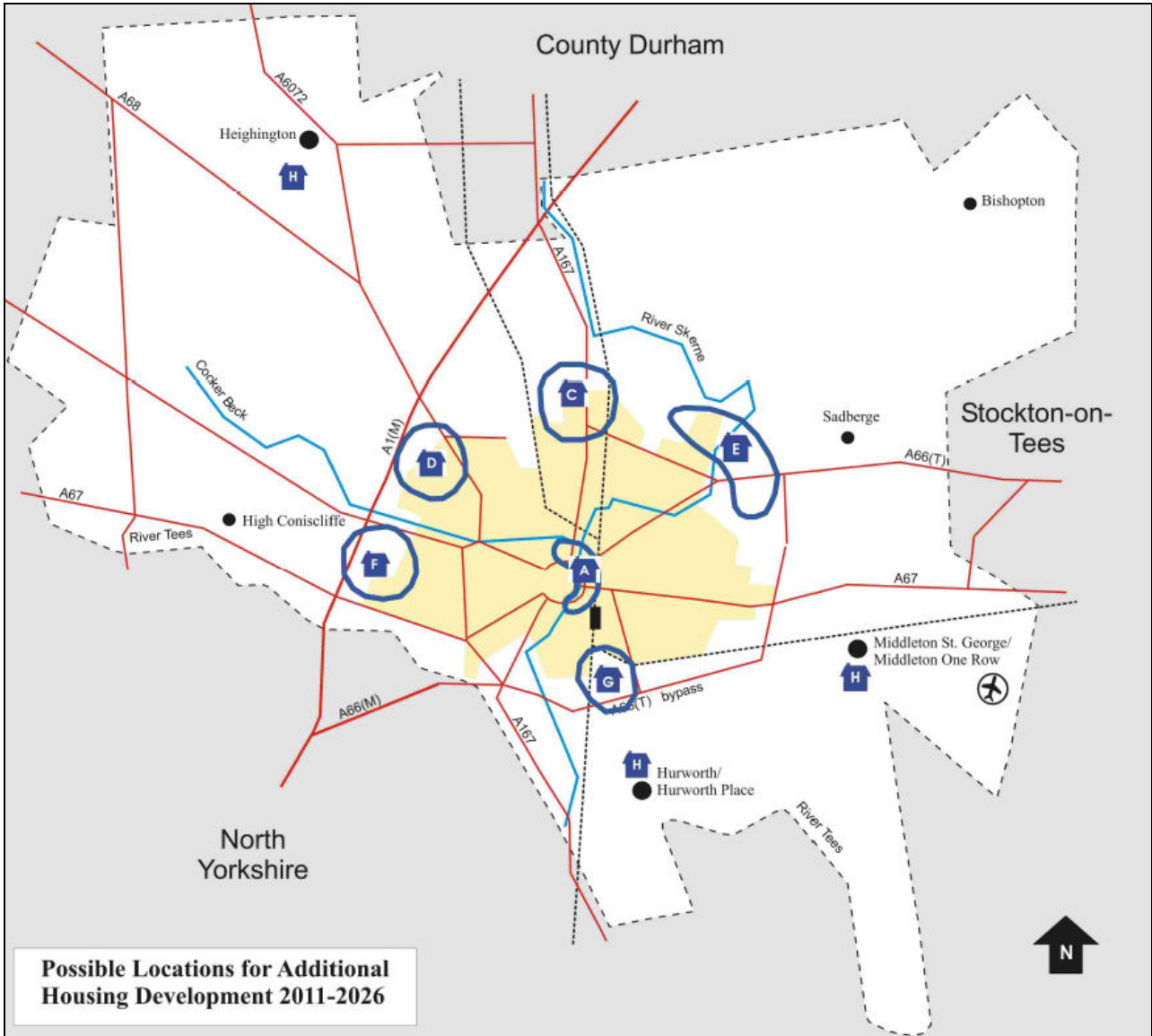
<b>Potential Housing Development Size</b>	<b>XS</b>	<b>S</b>	<b>M</b>	<b>L</b>	<b>XL</b>	<b>XXL</b>
No. of houses	200 or less	201-400	401-600	601-900	901-1200	1201+

The Council would welcome your response to this consultation. The consultation is open until **Monday 17th August 2009**. Please ensure that your reply reaches us no later than the 17th August by e-mail to [planning.policy@darlington.gov.uk](mailto:planning.policy@darlington.gov.uk) or by post to Strategy Manager, Chief Executive's Department (Regeneration), Darlington Borough Council, Town Hall, Darlington, DL1 5QT.

I look forward to hearing from you soon.  
Yours faithfully,

Valerie Adams  
Principal Planning Officer, Planning & Environmental Policy

**Appendix 2: Broad Locations Assessed as Potential Housing Locations**





**Appendix 3: housing capacity assumptions for the town centre fringe strategic location**

**Indicative Town Centre Fringe Residential Sites**

	Site Name	Site area	Indicative Number of Dwellings	Source/Assumptions
A	Borough Road	0.94ha	30	BDP Gateway Strategy Opportunity Area 1 indicated 85. 30 now considered to be more realistic, as a small element of mixed use commercial, cultural and residential scheme.
B	Parkgate	2.9ha	50	BDP Gateway Strategy Opportunity Area 2 indicated 120. 50 felt to be more realistic, as per Housing Growth Point (HGP) submission assumption for Park Place/Civic Buildings.
C	Cattle Mart and adjacent long stay car Park.	2.2ha	100	BDLP allocation, Policy H5.8, updated with HGP submission assumption.
D	Former Feethams Football Ground – 100% residential		150	HGP submission assumption. As per scheme of pre-application consultations carried out by the Esh Group.
F	Valley Street Area		300-600	Higher figure is HGP submission assumption. Lower figure reflects a scenario where either the gas holder cannot be removed or strong economic growth means that a higher proportion of the land is required for office type commercial uses.
G	Borough Road Industrial Estate and environs	1ha say	35	To reflect initial ideas about creating residential/commercial pedestrian environment leading to Central Park
H	Land to the north and east of Eastmount Road (Area 4 on 13/5/09 map)	4.22ha	0 - 105	Includes site 11 from the SHLAA. Using SHLAA net:gross assumptions and 40dph on net site area. Lower figure reflects scenario where gas holder cannot be removed.
			<b>665 - 1070</b>	

NB. Note prepared in 2009.

#### **Appendix 4: HBF letter**

Our Ref: NESHLAACM/LM

Monday 7 April 2008

Dear Sirs

#### **Strategic Housing Land Availability Assessments**

In February 2007 the Home Builders Federation wrote to you and all you colleagues at other North East Local Planning Authorities, to bring to your attention the need to ensure HBF members were included as key stakeholders in the SHLAA process.

We are aware that a number of Authorities are in the process of carrying out the above, and HBF Members are fully supportive of the process as outlined in CLG Guidance.

We would be delighted to be involved as a stakeholder and work in partnership with yourselves in order to deliver an Integral and Agreed document that informs the Local Development Framework. HBF would respectfully suggest and request that they are involved at the outset of the Assessment, so we can help shape the approach to be taken. As we stated in our previous letter, contact through the HBF Northern Regions office is the most appropriate form of facilitating the collaboration between our members and authorities.

As you will be aware CLG Guidance does contain a methodology which is strongly recommended as it seeks to ensure that the Assessment findings are robust and transparently prepared.

HBF are concerned that a number of LPA's appear not to be following the methodology contained within CLG Guidance and as a result "Assessments" have been prepared and have taken, in particular, no account of:

- The time and resources required for the project - "within the LPA's and the partnership". (HBF emphasis).
- The management and scrutiny arrangements, "including who is responsible for what and who makes the decisions". (HBF emphasis).
- The work programme "taking into account resources". (HBF emphasis).

By adhering to the above Guidance, HBF believe that the process could be sped up and a programme prepared.

As set out in advice in PPS3, a SHLAA should identify sufficient specific deliverable sites to deliver housing in the first five years. To be considered deliverable sites should

- Be available – this would not include a Local Authority owned site without a resolution and timetable for disposal
- Be suitable – this assessment should not deal with whether a site is brownfield or greenfield but whether it is in a sustainable location
- Be achievable – this needs to be based on current market conditions and whether it is viable for a builder to deliver on a site at a given point within the lifetime of the SHLAA

HBF would also wish to ensure that the SHLAA process contains a Trajectory of sites over the rolling 15 year period, and that this Trajectory contains outputs that are reasonable and based upon the market conditions prevalent at the time.

HBF would point out that the average completion rate for housing on a single site by a single builder ranges between 25 and 35 dwellings per annum. Where flats or apartments are involved the average completion rate ranges between 35 - 50, as a consequence of how they are constructed.

For large sites where two builders are involved, or where a builder operates the sites as 2 sites (i.e. one producing houses, the other flats) it is reasonable to double the output. Sites in the hands of an individual builder, even with a mix of houses and flats, very rarely exceed 50 dwellings per annum as output and never get to 100. This calculation, however, does not continue to exist where 3 or more builders become involved, as demand will limit take up.

It is important when calculating annual outputs that LPA's recognise the lead-in times to construction and completion. For example the provision of statutory services to a site can comfortably exceed a year, and it takes approximately 6 months from site start to first house completion. In the case of flatted schemes this period is much longer as large amounts are constructed in one go. It may be appropriate for sites under 50 dwellings to use a 1 year lead in time to obtain planning consent and start delivering on site and for sites over 50 dwellings use a 2 year lead in period before sites actually start appearing on site.

The HBF recognise that the Agenda is one of Delivery, and that to deliver all parties must work together. The HBF has seen examples recently of "Assessment Trajectories" stating that over 200 dwellings per annum will be delivered from single sites. It would respectfully point out that even when 20 builders were developing on Ingleby Barwick a figure of 400 per annum was rarely achieved. It would therefore, respectfully argue that delivery will not be achieved by loading individual sites with unrealistic output targets rather the focus should be on ensuring a range of sites (or selling outlets) are available to meet need and demand. We would argue that delivery of sufficient housing is far easier, even in difficult market conditions, if the number of sites/outlets is maximised.

If a site is "loaded" with an unachievable completion rate and it is subsequently developed more slowly than the LPA had assumed, then the Government's target will not be met. It therefore follows that a strong evidence on "build out" rates is necessary to inform decisions.

The HBF would repeat its absolute and total commitment to being a stakeholder to the SHLAA process and trusts that it will be invited to be a partner at the outset of your Assessment. It further trusts that its advice on outputs is recognised by LPA's.

Should you wish to discuss the matter further please do not hesitate to contact me.

Yours faithfully

**Carol McCann**  
**Regional Policy Manager (Northern Regions)**  
**Home Builders Federation**

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