

Response to Darlington Core Strategy (Examination in Public) Prepared by Smiths Gore on behalf of Durham Cathedral

Introduction

Durham Cathedral has landholdings at Great Burdon; identified in the Council's Core Strategy document as the 'Eastern Urban Fringe' (EUF), suitable to accommodate new development within and beyond the Plan Period. Some preliminary work has recently been prepared to help inform the Council's SHLAA update assessment and we consider that this work will help support the case for large scale, sustainable and sequentially preferable development of the land at the Eastern Urban Fringe. Accordingly, our reply to the Council's response to the Core Strategy document is set out below:

Paragraph 3.1.10

This paragraph defines the two main urban fringe locations that have been identified for new development outside of the main urban area: The North West Urban Fringe and the Eastern Urban Fringe (land at Great Burdon). We welcome the Council's position in this respect.

It goes on to state that deliverable land for significant new housing has been identified in these locations; distinguishing the North West Urban Fringe as 'the most sustainable urban fringe location' for new housing and the Eastern Urban Fringe as 'next most sustainable'.

This assessment is based upon the Council's preliminary, high-level Strategic Housing Locations Options Appraisal and the outdated SHLAA. The Options Appraisal and the SHLAA are the initial starting point for identifying suitable development land. We consider, however, that significant further work is required to assess the sequential deliverability of these sites.

At present, both the North West Urban Fringe and the Eastern Fringe score relatively closely within the Options Appraisal. The Council have recently begun engaging with the landowners to understand the capacity, constraints and opportunities at each of the sites and the outcome of these discussions will serve to inform the Accommodating Growth DPD and may impact on the Options Appraisal.

We consider that, in specifying a preference within the Core Strategy, the document does not allow a more detailed and thorough assessment to be undertaken as part of the forthcoming Accommodating Growth DPD and is therefore insufficiently justified. We continue to suggest that the final sentence of paragraph 3.1.10 be removed as this should be identified in the Accommodating Growth DPD, not the Core Strategy.

Policy CS1 (Sub Regional Role and Locational Strategy)

In light of the comments made in respect of 3.1.10 above, we would recommend that Policy CS1 be reworded to state:

"...New housing and employment development in Darlington Urban Area, the North West Urban Fringe and the Eastern Urban Fringe will be in accordance with the priorities and phasing identified in Policies CS5, CS10 and will be informed by the forthcoming Allocations DPD..."

In specifying a preference within the Core Strategy, the document does not allow a more detailed and thorough assessment to be undertaken as part of the forthcoming Accommodating Growth DPD without bias. Although the Council will be carrying out more detailed site assessments during the preparation of the

Accommodating Growth DPD, it is considered inappropriate for the Council to keep paragraph 3.1.10 in the document when it is insufficiently justified.

We therefore disagree with the Council's recommendations that no changes to this Policy or paragraph 3.1.10 are proposed.

Policy CS4 (Developer Contributions)

We welcome the Council's approach to Developer Contributions, as set out within Policy CS4. The Economic Viability Report (*Levvel June 2010*) has identified a significant degree of variance between the required affordable housing targets around the Borough. It recommends a 30% target but with a realistic perspective of what is achievable on a site by site basis. Policy CS4 adequately reflects this approach.

Policy CS4 (Developer Contributions)

To reflect the overarching approach to flexibility within CS4, we would suggest that site related infrastructure "be sought, where appropriate, through the use of standard charges, tariffs and formulas, taking into account the overall viability of the development." Paragraph 3 of Policy CS4 therefore needs to be reworded as set out above.

Phasing of housing development

While we welcome the Council's identification of the broad locations for new housing development at **Paragraph 6.1.5**, at this stage in the preparation of the LDF we consider it premature to specifically define the phasing of development sites on the basis that insufficient evidence has been prepared at this time to accurately inform phasing requirements. Indeed, the Council set out that the SHLAA will be the starting point for identifying (in the Accommodating Growth DPD) the land that needs to be allocated for new housing from 2016.

The phasing of development within the Core Strategy is unjustifiably prescriptive and restrictive and does not allow sufficient flexibility for the Accommodating Growth DPD to accurately and comprehensively assess the merits of each of the sites. Although the Council has argued that the phasing is broad and not site specific, it is considered that the speculative phasing at this stage can impede the outcome of the Accommodating Growth DPD, which should contain the more specific phasing figures.

The Cathedral supports the Council's assertion at **paragraph 6.1.8**, that development at the Eastern Urban Fringe would represent the first phase of a new neighbourhood in that location. We suggest, however, that the Core Strategy is not sufficiently flexible for the deliverability of future development at the Eastern Fringe to be considered in its entirety and to allow the forthcoming Accommodating Growth DPD to determine the most suitable and appropriate location for new development in accordance with accurate and up to date information.

The Council have not fully justified why the North Western Urban Fringe site is more sequentially preferable to the Eastern Fringe site. We would suggest that this is the role of the forthcoming Accommodating Growth DPD, being informed by ongoing discussions with landowners, accurate information and the ongoing 2010 SHLAA review. We would be happy to work with the Council to provide further information in respect of the land at the Eastern Fringe to help inform the Accommodating Growth DPD, however, at this stage it is considered that the more detailed information regarding development sites and phasing should be withheld until further research and evidence has been collected for the Site Specific DPD.

Housing Delivery

We support **paragraph 6.1.11** where the Council will ensure housing delivery in accordance with the housing trajectory. There is the recognition - within the Council's Housing Implementation Strategy for Darlington (July 2010) - that the amount of new housing to be delivered cannot be predicted with any certainty and indeed, the lack of sites allocated for new housing development can act as a constraint on housing delivery. It recognises that the Accommodating Growth DPD will serve to ensure sufficient housing land supply. We consider it vital that land supply should not be constrained by inflexible policies within the Core Strategy.

We suggest that the mechanism for review and delivery of housing sites in Darlington, as set out at 6.1.11, should be more specific and in accordance with the recommended proposed interventions within the Housing Implementation Strategy. In particular: (i) to identify and assess further sites through the SHLAA and (ii) to consider allowing those strategic locations where development is phased for later segments of the plan period to be brought forward earlier.

The Council refers to further development taking place in the EUF post this Plan Period. Although the Council claims that this confirms certainty to ensure a comprehensive development at the EUF in the longer term, this is not for certain. The planning focus may be different come the next plan period as planning policy and guidance may change via central government.

It is therefore incorrect to ensure future development of a location post the specified plan period. No certainty can be given at this stage that a comprehensive development will take place. Following this the removal of phasing and the removal of false promises should take place and the delivery of new housing for this plan period should be dealt with in more detail in the forthcoming Accommodating Growth DPD.

CS10 (New Housing Development)

The general direction of Policy CS10 is welcomed. However, as addressed in the comments above, it is inappropriate to specify a priority for delivery (in terms of order and timing) within the Core Strategy. In accordance with PPS12, the Core Strategy can define 'broad' locations for land use and the site specific detail can then be outlined in later development plan documents.

We object to the specific allocation of a fixed number of units at Policy CS10 and consider that the policy is not in accordance with national policy guidance and is not fully justified on the basis that further work is required to inform the sequential preference for delivery of the strategic housing sites, their capacity to accommodate new development and the impact of development on the wider environment. To impose housing figures on each site at this stage is premature, until more detailed work is undertaken as part of the Accommodating Growth DPD.

To ensure that the Core Strategy can be found to be sound, we would suggest the removal of the imposed housing figures at CS10. We would suggest the identification of the broad locations for development (i.e. Eastern Urban Fringe and Northern Urban Fringe) but make it clear that deliverability, timing and scale of development will be explored further as part of the work to inform the Accommodating Growth DPD.