

## **Darlington Core Strategy DPD Public Examination Matters for Discussion**

### **Matter 1 – Strategy**

**1. The Core strategy was prepared to be in conformity with the Regional Spatial Strategy for the North East, although references to the RSS have been removed from the Publication Draft. As a consequence, is the basis for the strategy, the amount and phasing of new housing development and the provision for additional employment land clear and justified?**

It is noted that there remains one reference to the RSS in the Publication Draft DPD - in Cross Reference No.2 on Page 43 which provides the only explanation of the source of the overall net housing requirement of 8675 dwellings 'adopted' by the Council as the basis for future housing land supply. Oddly this is a reference to the 2007 Dwelling Provision Technical Appendix 2007 rather than the approved 2008 RSS.

Whilst the supporting information to the RSS could be used to act as basis for the Council's Core Strategy the Council will be aware that the population projections on which the RSS figures are based have themselves been superseded by more recent 2006 based projections (published June 2008) that indicate that population levels across Tees Valley and in Darlington Borough will be higher than those used in the RSS and that this will have a knock on effect on the number of new dwellings needed to accommodate the resulting increased number of households. Paragraph 8 of the Executive Summary to the 2009 SHMA summarises the position succinctly and states:

*“The Regional Spatial Strategy (RSS), published in July 2008, sets a requirement for 35,700 net additional dwellings for 2004-21, based on a 2.5% economic growth rate. This housing requirement is very close to the latest projection for a 36,000 household increase for the same period. Given that the household projections do not factor-in the full economic growth plans, this could be seen as a relatively cautious planning figure. The “Growth Point” bid would increase the additional homes target to at least 39,500. The strong strategic context for Tees Valley and positive recent trends suggest this higher figure may be desirable although this will depend fundamentally on economic conditions and performance.”*

The Growth Point bid was of course accepted and it is noted that in the recent Tees Valley Living report entitled: Creating Thriving Communities in Tees Valley: A Statement of Housing Ambition 2010/2020, indicates an on-going desire to promote economic growth and increase the housing land supply in the Tees Valley as well as recognising the economic benefits that an active and healthy construction industry can have on local economies.

As a result of the above we consider that the basis for the net housing targets used in the DPD are not clear not clear and fully justified. The use of such historical evidence is neither robust nor justified in the light of more up to date evidence and stated ambitions of Tees Valley Living of which DBC is a partner. At best they are an interim measure.

**2. The Core Strategy should focus on the critical issues that relate to the way the area is intended to develop. Have the critical issues been identified and will the strategy adequately address those issues?**

The key spatial strategy issue the Core Strategy needs to deal with is how much development should be planned for, where it should be located and when should it be delivered to ensure the delivery of wider community strategy and aspirations . We would of course argue that the strategy in so far as it relates to the strategic housing locations identified in the DPD is flawed as we believe the locations identified in the DPD do not represent the most appropriate strategy when considered against the alternatives available and in particular the alternative of identifying land at Coniscliffe Grange Farm as a strategic housing location in place of, or in addition to, land on the NW and NE fringes of the urban area and town centre. Our submitted representations explain why

**3 The test of effectiveness in PPS12 requires that the strategy should be sufficiently robust to ensure delivery. Is the means by which the strategy will be delivered clearly articulated, including ensuring there are no policy or funding barriers to delivery and that the necessary infrastructure will be in place?**

We have concerns about the deliverability of new housing within the Town Centre Fringe development area identified in the DPD. This concern relates to the viability of any such schemes bearing in mind the additional and substantial costs associated with development on PDL and dealing with flood

risk issues in this area combined with the fact that it is a poor market area which will mean development values will be low. We have already seen the flagship Central Park development scheme stalling for a number of years despite significant public investment towards site preparation etc, with no immediate prospect of development. The Draft Accommodating Growth DPD indicates (Paragraph 5.12) that the developers are looking to renegotiate the mix of uses on this site. It is likely therefore that the mix of uses in the scheme will be much changed from that originally envisaged and the timescale for completion of the site considerably lengthened.

The ongoing availability of public sector funding to support similar schemes in Darlington within the Town Centre Fringe area must be questionable in the light of the recent Comprehensive Spending Review, reductions in available funding and the revised role for the HCA and associated regeneration organisations.

**4 Delivery of the Core Strategy is dependent on the delivery of strategic sites, with the broad locations, amounts and order of development, included in the DPD. Are the broad locations the most appropriate to deliver the strategy, considered against reasonable alternatives?**

We do not consider that the broad locations identified in the DPD are the most appropriate to deliver the DPD strategy as required by PPS12 and have already outlined in submitted representations our reasons for recommending that our clients' land at Coniscliffe Grange Farm should be identified as a strategic housing location in addition to, or as a replacement for, one of the Council's suggested sites. The attached Illustrative Master Plan provides an impression as to how the site might be developed.

The reasons why the land at Coniscliffe Grange Farm is considered more appropriate than the suggested DPD options include: greater sustainability, greater deliverability, better market, better living conditions, less impact on highway congestion, and it is more suited to meeting identified housing demands/needs and aspirations.

**5 Core strategies are concerned with development over a long time frame during which issues and circumstances may change. Does the strategy show sufficient flexibility to handle contingencies through the plan period?**

We do not agree that the Core Strategy approach to the supply and release of housing land, as currently formulated, provides the necessary flexibility to deal with changes in circumstance over the plan period and ensure the delivery of the requisite amount new dwellings to meet future needs and aspirations.

As the question points out Core Strategies are concerned with long term planning of an area and as such it is important that sufficient flexibility is built into the strategy that they promote to ensure that overall vision and objectives are met. This includes the provision of sufficient land to accommodate future housing needs. Experience in other Tees valley authorities e.g. Middlesbrough, Redcar and Cleveland and Hartlepool have amply demonstrated that an over-reliance on a small number of strategic sites means that these plans lack the necessary flexibility to react to changing circumstances.

For example housing land supply in the Hartlepool Local Plan was heavily reliant on two strategic sites i.e. Middle Warren and Victoria Harbour. Whilst the green field site at Middle Warren has been developed largely in line with projections the Victoria Harbour project has completely failed to come to fruition with the effect that house building rates in the Borough has been well below projected requirements. The Council was unable to react to this shortfall because the Local Plan was inflexible and did not make any allowance for the shortfall to be met through the release of other strategic land / sites, with a resultant adverse impact on population loss and economic development .

A similar situation is occurring in Middlesbrough where strategic housing sites at Middlehaven and Hemlington Grange allocated in the comparatively recently adopted Core Strategy and Regeneration DPDs (adopted 3 and 2 years ago respectively) have not come forward as projected and don't look likely doing so in the near future . The Council were warned of this at the public examinations into the DPDs. Here too this has had a dramatic impact on housing building rates which are well below trend projections and this shortfall is putting at risk wider social and economic objectives of population retention and economic stability/growth.

Finally in Redcar & Cleveland delays to the strategic Low Grange Farm site have meant that housing completions are well below projected levels and this in turn is putting a strain on the overall spatial strategy and the split of development between the conurbation and the East Cleveland villages. The Core Strategy offers no alternative solution to meeting the Borough's needs

In all three authorities the 'Development Plan' has lacked the necessary flexibility to respond to changing circumstances in a robust and timely manner either because they are too prescriptive or have failed to identify sufficient alternative strategic sites to meet housing needs.

The conventional response to such a change in circumstance would be to suggest a review of the development plan. However experience suggests that this approach is too cumbersome and time consuming and will not provide the necessary flexibility within the timescale required to avoid serious consequences.

To avoid the need for an early review of the Core Strategy therefore two options are possible to improve flexibility:

1. Remove all references to specific strategic growth areas/urban extensions and replace with a generic policy stating that such development will be necessary to meet net housing requirements over the plan period - in effect devolving the decision on where urban extension should take place down to the Accommodating DPD; or
2. Increasing the number of potential strategic allocations/urban extensions to a level where flexibility becomes inherent as there are fewer 'eggs in one basket'. Such an approach could be accompanied by a proposed phasing arrangement in the plan with later phases of strategic sites being brought forward to make up any shortfall in early phases of development on other strategic sites – as required and in a timely and responsive fashion without the need for a review of the Core Strategy.

In view of the more locally distinctive approach taken by the Council in the Publication Draft Core Strategy this second option would appear to be the more appropriate route for Darlington.