

ANNEX

(a) new housing provision in Policy CS10

The first three columns of Table 6.1 (preceding Policy CS10) are clearly derived from the RSS but the only indication of the derivation of column 4 is in para 6.1.2 which states that for the period 2021 to 2026 the average annual rate of provision in the years 2004-2021 has been applied. The basis for this appears to be set out in Policy 28.4 of the RSS. It provides for an increase on the average annual rates for each of the previous quinquennial periods but delivery will rely heavily on greenfield allocations from 2021 (Figure 6.2). Delivery in any event is reliant on recovery of the housing market which the Housing Implementation Strategy (SD004), para 3.6, suggests is high risk.

It appears to me that, even if the CS makes it clear the basis for the amount of new housing is the RSS, this in itself is not sufficient and a clearer explanation is required to ensure the policy is justified and deliverable.

(b) the employment land allocation in Policy CS5

The policy indicates that provision will be made for up to 235ha of additional land for general and mixed use employment. The general and mixed use first and second priority sites total about 128ha. A further 125ha is indicated at the key employment locations of Faverdale and Heighington Lane. This gives an overall total of 253ha.

Policy 18 of the RSS indicates that LDFs should make the appropriate provision of general employment land (235ha) plus Key Employment Locations (125ha), totalling up to 360ha. The Employment Land Review, para 9.6 (SD017) concludes that there is a supply of some 360ha which is in accordance with the RSS, but para 9.7 advises that a total of some 101.5ha is required over the plan period, well below the RSS figure. This figure appears in the CS at para 4.1.4.

On the one hand – based on the RSS – it appears there is insufficient land allocated whilst on the other – using the ELR – there appears to be too much. The basis for the Policy requires clarification in order to be seen as justified.

(c) the provision for affordable housing in Policy CS11

The Affordable Housing SPD elaborates on the adopted Local Plan policies H9 and H10 and was published in April 2007. To this extent, therefore, it is limited but does highlight an affordable housing shortfall for the period December 2005 – December 2010, equivalent to 265 homes per annum over the subsequent five year period. The shortfall figure is carried forward into the Housing Strategy 2008-2012 document (SD027), Table A.

The Core Strategy, para 6.2.4, refers to an annual shortfall of 513, exceeding the Borough's annual housing requirement, which is based on Table 8.2 of the SHMA (SD015), p155. The SHMA advises (para 8.27) that the relative level of requirements is greatest in Darlington of authorities in Tees Valley, across each of the measures used.

However, Policy CS11 indicates an annual target of 35 additional affordable homes for the period 2011-2016 and at least 50 per annum thereafter. A simple calculation suggests a total for the Plan period of $(35 \times 5) + (50 \times 10) = 675$ dwellings. The Policy also indicates that up to 30% affordable housing would be sought, compared to a maximum shown to be achievable for some sites in the Economic Viability of Housing Land study (SD007). That study also referred to an agreed tenure mix of 20:80 social rented:intermediate housing.

It appears that the Policy might not deliver an appropriate level of provision to meet the Government's aims for affordable housing. In order to be justified there needs to be a clearer indication of why the annual target is low relative to the shortfall; why the required mix includes a lower percentage of affordable housing than SD007 indicates would be economically viable for some sites, and why there is no indication of the targets for social-rented and intermediate housing as suggested by PPS3 (para 29).