

## Comment

<b>Consultee</b>	Simon Bainbridge (1164209)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Darlington Local Plan 2016-2036 (Regulation 19)
<b>Comment by</b>	Simon Bainbridge (1164209)
<b>Comment ID</b>	DBLPPS247
<b>Response Date</b>	16/09/20 19:22
<b>Consultation Point</b>	Policy H 1 Housing Requirement (Strategic Policy) ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.3
<b>Question 1a</b>	
<b>Do you consider that the Local Plan is Legally compliant?</b>	No
<b>Question 1b</b>	
<b>Do you consider that the Local Plan sound?</b>	No
<b>Question 1c</b>	
<b>Do you consider that the Local Plan complies with the Duty to Cooperate?</b>	No
<b>Question 2</b>	
<b>Do you consider that this part of the Local Plan is unsound because it is not: (tick all that apply)</b>	<ul style="list-style-type: none"><li>. Positively prepared</li><li>. Effective</li><li>. Justified</li><li>. Consistent with national policy</li></ul>
<b>Question 3a</b>	
<b>Your Comments</b>	

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HOUSING REQUIREMENTThe methodology used by DBC to arrive at a figure of 492 dwellings needed per year deviates from the prescribed form and is not supported by facts but rather aspiration and assumptions and is not therefore justified. These figures are based on estimates and broad assumptions unsuitable for a matter of this importance. The DBC figure of 492 dwellings per annum is nearly 3 times bigger than the ONS figure of 177 dwellings per annum. The informal consultation stage of the Draft Plan resulted in a significant number of reasoned objections to this policy but DBC has chosen to ignore these representations.

**Question 4**

**Changes Sought**

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Policy H1 should replace the DBC figure of 492 house per annum to the ONS figure of 177 houses per annum and this is based on Government guidance which requires from March 2018 any Local Authority Plan which has not reached submission stage to adopt the standard methodology OAN. DBC's increased figure has to be based on economic growth and the level of increase must be realistic and justified. DBC have failed to put forward any exceptional circumstances to warrant this higher figure.

The use of an accurate OAN figure will make the Plan sound and legally compliant.

**Question 5**

**Attendance at Examination Hearings**

**If your representation is seeking a change, do you consider it necessary to participate in the examination hearings?**

No, I do not wish to participate at the examination hearings

**Question 6**

**Do you request to be notified that the Local Plan has been submitted to the Secretary of State for independent examination under section 22(3) of the regulations and to be notified of the adoption of the Local Plan?**

Yes, I request to be notified

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<b>Event Name</b>	Darlington Local Plan 2016-2036 (Regulation 19)
<b>Comment by</b>	Simon Bainbridge (1164209)
<b>Comment ID</b>	DBLPPS249
<b>Response Date</b>	16/09/20 19:32
<b>Consultation Point</b>	Policy H 10 Skertingham - Strategic Site Allocation (Strategic Policy) ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.3
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DBC's inflated housing figures require readjustment and having adopted a reasoned and evidence based housing figure this allocation would not be required to fulfil housing need during the lifetime of the Plan. This allocation results in a vast increase in the development limits of the town into open countryside. The allocation results in the loss of Skerningham Countryside Park and Skerningham Community Woodland both of which have been strongly promoted by DBC and form a significant part of policy under the Council's Green Infrastructure Strategy 2013 – 2026, the Green Infrastructure Strategy Action Plan 2013 -2026, the Core Strategy May 2011, "Walk the Darlington way", Parks and Green Spaces. Some of the woodland created on the site, being part of the Tees Forest Project was planted using public money and will be destroyed by moving Darlington Golf Club. It will result in the loss of public access which is highly valued, extensively used and easily reached by local residents for recreation. This conflicts with the Plan's aim of improving the health and well-being of the Town's population. This is now particularly relevant as the need for access to open space has been highlighted by the current Covid 19 pandemic and use of this area by the public has increased very significantly since lockdown began in March 2020.

The allocation will result in the loss of wildlife. particularly birds. 58 species of bird are regularly seen at Skerningham of which 11 are on the red list and 10 on the amber list produced by the British Trust for Ornithology as being of conservation concern. This allocation is in conflict with the Plan's aim of enhancing the green infrastructure and protecting wildlife.

The proposed relocation of Darlington Golf Course into Skerningham Countryside Park cannot be justified on the basis there is a perfectly good golf course a short distance away which is fully mature and no reason is given for the change of location. The Plan seeks to produce a net increase in community woodland but the creation of the relocated golf course will result in the felling of most of approximately 75 acres of woodland and even if this was replaced elsewhere it would not mature within the Plan period. It also runs against Darlington Borough Council's own policies on the protection of trees and green spaces.

The local road network is already very congested and there will be a huge increase in traffic resulting from the development, making it unsustainable. With Climate Change high on the world agenda and an increase in pollution from emissions, noise and light this allocation cannot be justified.

During the consultation process on the Draft Local Plan more than 100 objections were made to the inclusion of Skerningham as an area for housing development. No attempt has been made to consider any of those objections. This is a failure by DBC in their Duty to Co-operate. The policy has not been positively prepared to meet the needs of the residents of Darlington and cannot be justified. DBC and the site promoters refer to the Skerningham Strategic Allocation as a "Garden Village", but this wording does not appear in the draft Plan in relation to Skerningham. The allocation as proposed would be urban sprawl as it meets none of the criteria for a genuine "Garden Village". This is confusing and misleading for the public.

In 2015 Darlington Borough Council produced its "Strategic Housing Land Availability Assessment (SHLAA)" which can be viewed on their website. That assessment indicated that Skerningham is not suitable for housing development for reasons including: it is not suitable as rural greenfield site; flooding; loss of countryside and significant visual impact; detrimental effect on the tranquility of the area; the need to protect riparian habitat; Skerningham Plantation Site of Nature Conservation Interest falls within the site; possibility of great crested newts and bats on site; medium-high archaeological potential of the site; high risk of contamination due to Barmpton Quarry landfill; major highway network implications; access from the existing local road network would not be acceptable; no sewage or water infrastructure in the vicinity. within 3 years DBC decided none of those findings now to be applicable or relevant. How can DBC change course without any explanation or justification for such a conclusion.

#### **Question 4**

##### **Changes Sought**

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Policy H10 should be completely removed from the Plan as a zone for housing development. These changes would improve the soundness of the Plan by enabling Darlington Borough Council to achieve their own climate change targets and implement their existing green policies.

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<b>Event Name</b>	Darlington Local Plan 2016-2036 (Regulation 19)
<b>Comment by</b>	Simon Bainbridge (1164209)
<b>Comment ID</b>	DBLPPS250
<b>Response Date</b>	16/09/20 19:35
<b>Consultation Point</b>	Policy H 2 Housing Allocations (Strategic Policy) ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.3
<b>Question 1a</b>	
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National guidelines state that development in the countryside should be a last resort. DBC are failing to be consistent with the NPPF in making Skerningham a priority for development.

The poorly supported DBC housing figures mean that the Skerningham Strategic Allocation (site 251) is not required for housing during the life of the Plan and accordingly the allocation will be ineffective in the delivery of the Plan.

Table 6.3 lists the Skerningham Allocation as site 251 and is described as "Urban Extension". Notwithstanding this statement DBC and the site promoters sought and achieved Garden Village Status for this site despite it not meeting any of the MHCLG requirements for Garden Villages which state that "brown field" sites must be maximised; the term "Garden" must not be used as a convenient label; sites must not be an extension of a town or village and must respond to local housing needs. There appears to be much confusion as to what this allocation is purporting to be. An urban extension meets none of the requirements for a Garden Village, and is therefore urban sprawl, so is the Skerningham allocation misplaced in table 6.3?

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Site 251, the Skerningham Allocation needs to be removed from the Housing Allocation. This will improve the soundness of the Plan as it is a misplaced and mis-described allocation which is not required in any event to fulfil housing needs during the life of the Plan.

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