

## Comment

Consultee	Miss Leanne Carroll (1250218)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Miss Leanne Carroll (1250218)
Comment ID	DBLPPS47
Response Date	07/09/20 14:29
Consultation Point	Policy ENV 6 Local Green Space ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3

### Question 1b

Do you consider that the Local Plan sound? No

### Question 2

Do you consider that this part of the Local Plan is unsound because it is not: (tick all that apply)

### Question 3a

### Your Comments

Please give details of why you consider that this part of the Local Plan is not legally compliant or unsound or fails to comply with the Duty to Cooperate.

Skerningham Community Woodland should be designated as a Local Green Space. It meets ALL of the NPPF's designation criteria:

1. *in reasonably close proximity to the community it serves;*
2. *demonstrably special to a local community and holds a particular local significance, for example because of its:*
  - *beauty,*
  - *historic significance,*
  - *recreational value (including as a playing pitch),*
  - *tranquility,*

- richness of its wildlife; and

3. local in character and is not an extensive tract of land.

*"The NPPF does not define what qualifies as 'close proximity' or 'extensive tract of land'. However, using Natural England's Accessible Greenspace Standards as a helpful guide, it is suggested that 'close proximity' be defined as within 2km (1.25 miles) and an 'extensive tract of land' be defined as over 20 hectares (50 acres)."*

The ten-hectares of Skerningham Community Woodland are only a ten-minute walk from housing on the town's northern fringe.

Darlington Borough Council's own *Rights of Way Improvement Plan (ROWIP)* recognises that the woodland is "fundamentally attractive, giving people a sense of tranquillity".

The woodland is popular with dog walkers, joggers, walking groups, for picnics and as a venue for events, for example an enchanted woodland event for families, which included crafts, activities, storytelling etc.

The ROWIP report recognised that the woodland was "*beginning the process of becoming a part of the cultural landscape of Darlington, as well as being a desirable physical feature, loved by a few at present, but soon to be a very popular location*" at the time it was written.

The importance of the woodland for "*landscape and biodiversity reasons*" is also mentioned.

However, the most important reason for having Skerningham Community Woodland designated as a Local Green Space, which will give it protection consistent with that in respect of Green Belt, is because of the presence of natural graves on the site.

The community land is affectionately referred to as "*Dave's Wood*" in memory of a respected illustrator and conservationist from Darlington, David Green, who was buried in a reed coffin, decorated in painted butterflies and fresh leaves, in the woodland where he would often walk. Six rare and prized black poplar trees were planted in a circle around him and a seventh directly over his grave - a subtle natural marker of his final resting place.

The Good Funeral Guide states, "*Natural burial is a term used to describe the burial of human remains where the burial area creates habitat for wildlife or preserves existing habitat (woodland, species rich meadows, orchards, aquatic, sustainably managed farmland etc.) which are rich in flora and fauna. Where a funeral precedes such burial, it would seek to minimise environmental impact by prohibiting embalming and, where a coffin is used, ensuring that this be made of natural, biodegradable materials.*"

Dave's Wood should remain a tranquil spot for quiet reflection for the families whose loved ones rest there. The relocation of Darlington Golf Club into and around the woodland as part of the Skerningham Strategic Allocation is wrong and it is not "*a suitable location within the allocation boundary*".

Skerningham Community Woodland is recognised as a "*large nature reserve*" on the Council's website and has been included in the Local Plan as a "*Designated Wildlife Area*" and should be regarded as sacred ground and preserved for wildlife and for the enjoyment of nature by residents.

## Question 4

### Changes Sought

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Skerningham Community Woodland should be included in the Local Green Spaces allocation because it meets all of the criteria set out in the NPPF. The existence of natural graves on the site makes this request even more urgent and worthy of consideration.

**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

## Comment

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Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Miss Leanne Carroll (1250218)
Comment ID	DBLPPS49
Response Date	08/09/20 16:14
Consultation Point	Figure 6.1 Skerningham Masterplan Framework ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.5
Question 1b	
Do you consider that the Local Plan sound?	No
Question 2	
Do you consider that this part of the Local Plan is . . . unsound because it is not: (tick all that apply)	Consistent with national policy
Question 3a	
Your Comments	
Please give details of why you consider that this part of the Local Plan is not legally compliant or unsound or fails to comply with the Duty to Cooperate.	
<p><b>NPPF, Section 896.</b> “Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.” 97. “Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location;” Darlington’s Rights of Way Improvement Plan (ROWIP) can be found on Darlington Borough Council’s website. The vision is “to create a facility that allows all of the public to have sustainable access to quality countryside. Countryside where they may experience the full richness of an unpolluted and biodiverse environment, as well as one that encourages healthy and safe travel”. Currently, and importantly, the</p>	

Skerningham area is a large accessible wedge of land (490 hectares) without busy roads running through it. When looking at where high-quality countryside can be found in Darlington, Skerningham Community Woodland (which is in a secluded spot, a ten-minute walk from houses along quiet tracks) is mentioned in the ROWIP report: “*This attractive area of open access woodland has seen a rapid increase in its use which is unlikely to have happened if it were simply the case of creating a new path with no additional landscaping and biodiversity improvements to go with it.*” The *Darlington Open Space Strategy 2007-2017* was updated in 2010 to include the woodland: “*The three community woodlands in the urban fringe have been included in the nearest locality Merrybent (South West), South Burdon (South East) and Skerningham (North East) as a result of the benefits they have to the community in that locality.*” The relocation of Darlington Golf Club (an 18-hole parkland course described on its own website as having “*lush, tree lined fairways*”) a few hundred metres into Skerningham Community Woodland (developed with the help of Forestry grants and opened in 2004 as an addition to the Tees Forest) so that the current site can be developed will see residents lose a well-used and high-quality part of their countryside. It is important to note that the land earmarked for biodiversity and habitat creation (shown on maps presented to residents by the developers) would be separated from existing and any new homes by a local distributor road connecting the A167 and A1150. A feeder road from the Northern Link Road would also enter the centre of the Skerningham site through this earmarked land. The NPPF states that sites of biodiversity should be protected and enhanced yet the viability of the replacement site for biodiversity and habitat creation is already compromised by providing an entry point through it at some point in the future should the Northern Link Road be built. This would not be an “*equivalent or better provision in terms of quantity and quality*” and should not be regarded as a “*suitable location*”. According to the ROWIP report, the countryside fails to deliver quality for a few reasons, including “*the separation of the countryside by busy roads*”. Other factors affecting quality are “*litter*” (roads are notorious litter hotspots) and “*urban noise*” (in this instance generated by both traffic and the proximity of new homes). As a result of a local distributor road running close to the land set aside for biodiversity and habitat creation and a feeder road cutting through it, as well as new housing being situated directly on the other side of this new infrastructure, any replacement woodland could not provide the same quality as Skerningham Community Woodland, pollution from vehicle exhausts would also make it an unhealthy and noisy environment to exercise in, it would be a lot busier and residents might therefore be less inclined to want to spend significant amounts of time there, especially families, the elderly and those with impaired abilities. This would impact on “*health and well-being*”. The Local Plan makes reference to the Government’s public health strategy - Healthy Lives, Healthy people - which explicitly recognises that “*health considerations are an important part of planning policy*”. Skerningham is definitely NOT “*surplus to requirements*”. More people than ever before have been walking its fields and woodlands during recent months and discovering it for the first time. The *Darlington Open Space Strategy 2007-2017* recognises the importance of the area... “*The Skerningham/Barmpton Lane area is identified as a location where a strategic countryside site could be developed, due in part to the area’s existing high landscape value, which attracts visitors from throughout the Borough and beyond.*” ..and the ROWIP report sums up nicely why this area could NEVER “*be replaced by equivalent or better provision in terms of quantity and quality in a suitable location*”. “*This area has the potential to be the Jewel in the Crown of Darlington’s countryside provision, having most of the elements necessary to fulfil a majority of the aims central to the vision of this ROWIP.*” The aims being: “*This ROWIP aims to provide a strategy that helps to target resources towards achieving Darlington’s vision for countryside access. This aim is closely related to the findings of national, regional and local research, which emphasise the importance of a raft of benefits that comes with improved countryside access. These benefits include the value of green exercise to mental and physical health as well as helping increase the public’s perception of the value and importance of the natural world. This in turn encourages people’s support for action and use of resources to improve the green environment. In addition there is a need to help reverse the process of an increasing gulf between the urban population and the people in the rural areas.*”

## Question 4

### Changes Sought

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Take the Skerningham site out of the Local Plan and retain and enhance this high-quality countryside for recreation (and wildlife) so that Darlington gets its **Jewel in the Crown!**

**Question 5**

**Attendance at Examination Hearings**

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

**Question 6**

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Yes, I request to be notified

## Comment

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Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Miss Leanne Carroll (1250218)
Comment ID	DBLPPS115
Response Date	14/09/20 13:50
Consultation Point	Policy H 10 Skerningham - Strategic Site Allocation (Strategic Policy) ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3
Question 1b	

**Do you consider that the Local Plan sound?** No

### Question 2

**Do you consider that this part of the Local Plan is . . . Consistent with national policy unsound because it is not: (tick all that apply)**

### Question 3a

#### Your Comments

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NPPF, Section 15 180b) “Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason;” The most recent version of Darlington’s Strategic Housing Land Availability Assessment (SHLAA) was published in mid-September 2015 and “provides an assessment of the suitability, availability and achievability of potential new housing sites and informs housing and planning policy”. A few points were raised with regards to the suitability of Skerningham, including: “Would have a detrimental effect on the tranquillity of the area - CPRE have identified the area as ‘significantly tranquil’.” This ties in with Darlington’s Rights of Way Improvement Plan (ROWIP) which recognises that it is ONLY the northern part of the town that has “countryside that can provide venues for quiet enjoyment” and “probably the best countryside for quiet recreation”. It is also indicated in Section 15 that valued landscapes and

sites of biodiversity should be protected and enhanced. The value of the Skerningham site is acknowledged by its inclusion in *Darlington's Green Infrastructure Strategy 2013-2026* which seeks to improve "Skerningham Countryside Park" in a number of ways, for example by planting more trees and hedgerows, by constructing a small car park and putting up more signs to improve access for those with limited mobility and people with disabilities, and by extending the rights of way network and permissive routes. Darlington's draft *Tree and Woodland Strategy 2021-2031* sets out its policy for trees on private land (which the community woodland now is): "*As the Local Planning Authority, we have a statutory duty to take steps to protect trees that we believe make an important contribution to the amenity of the areas.*" Skerningham Community Woodland, with its permissive paths and "Walkers Welcome" signs, is the only accessible woodland for this part of town and as such makes an important contribution to the amenity of this particular area. What makes the woodland even more valued is that it provides a home for the black poplar. Hundreds of saplings were planted in the Tees Forest community woodlands at Skerningham and near South Burdon. Some lovely examples of these trees can be found around the natural graves in Skerningham Community Woodland. It was hoped that Darlington would become a focal point for their resurgence. Skerningham Community Woodland is one of the few places in England where black poplars survive and Darlington is at the limit of the black poplar's northern territory. The woodland should therefore be retained and enhanced as set out in point i.vi of **Policy H 10** because it contributes to the landscape character and in a very unique way.

The *North East England Nature Partnership (NEENP)*, which has devised an action plan for this priority species, discusses its plight: "*The black poplar is a tree of wet woodland and stream sides, particularly in the floodplains of lowland rivers. It is now the UK's most endangered and rarest native timber tree and has declined close to extinction with less than 3,000 individuals remaining. Most of these are nearing the end of their natural lifespan and will be lost in the next few years. Modern changes to the landscape, including drainage over the last forty years and the management of rivers and riverbanks has led to the disappearance of this tree's natural habitat.*" Further evidence of the value of the woodland can be found in the ROWIP report, which, at the time it was written, picked up on how Skerningham Community Woodland was "*becoming a part of the cultural landscape of Darlington*", how it was "*a desirable physical feature*" and would soon become "*a very popular location*", and this is definitely the case today. The report lists its endearing features as: 1. "*It is an area of Open Access.*" 2. *The paths that run through it provide a clear sense of direction, but not by simply providing a single route through; once in Skerningham, people can wander through the woodlands following a whole selection of different paths.*" 3. *It is a large expanse of Open Access land (nearly 100 acres in total).*" 4. *People have a sense of confidence in knowing that they are allowed to be there.*

5. *This woodland is an area important for landscape and biodiversity reasons.*" Skerningham Community Woodland is also recognised as being an important area for biodiversity on both Darlington Borough Council's website, where it is described as a "*large nature reserve*", and in **Section 9 (Environment)** of the Local Plan, Figure 9.1 *Darlington's Green Infrastructure Network*, where it is marked as a "*Designated Wildlife Area*". Furthermore, in 2004, Skerningham Community Woodland was part of a project, funded by a £64,000 grant from the New Opportunities Fund, to improve the biodiversity and recreational use of nature reserves across the Borough, as well as increasing the total area of protected land within Darlington. The target, set by English Nature, was to create one hectare of local nature reserve for every 1,000 people, and for that land to be located within one kilometre of where those people live (Skerningham Community Woodland is a ten-minute walk from existing homes). As of 2012 however, Darlington was falling below the national standard and had only created 0.64 hectares for every 1,000 people, therefore every hectare matters. The 2015 SHLAA report lists "*Skerningham Plantation SNCI*" as one of the constraints of the site. SNCI, or Site of Nature Conservation Interest, "*is a designation given to sites that have substantive local nature conservation and geological value*". When looking at factors that restrict development on Darlington Borough Council's website, it says: "*Designated sites within the natural environment are protected against destruction or gradual erosion. Types of sites include:*

- . **Sites of Nature Conservation Importance (SNCIs)**
- . *Local Nature Reserves (LNRs)*
- . *Sites of Special Scientific Interest (SSSIs)*
- . *Great Crested Newt Sites*
- . *Ancient Woodland*
- . *Hedgerows*"

I spend a great deal of my spare time taking photos of the local wildlife while walking through Skerningham's farmland and woodland with my dog and family, trying to document what is there. I am logging sightings with the *Environmental Records Information Centre North East (ERIC)*. Below are

the bird species I have personally seen. After each species, I have stated if they are on the red or amber list (species needing urgent action and the next most critical group respectively). I have also shown which species have additional protection under *SCHEDULE 1 of the Wildlife and Countryside Act 1981*, which are from *Annex I of the Birds Directive* and which are priority species in the *UK Biodiversity Action Plan (UK BAP)*: Cuckoo (red, UK BAP) Redwing (red, SCHEDULE 1) Fieldfare (red, SCHEDULE 1) Skylark (red, UK BAP) Grey partridge (red, UK BAP) Linnet (red, UK BAP) Mistle thrush (red) Yellowhammer (red, UK BAP) Yellow wagtail (red, UK BAP) Grey wagtail (red) House sparrow (red, UK BAP) Starling (red, UK BAP) Tree sparrow (red, UK BAP) Song thrush (red, UK BAP) Herring gull (red, UK BAP) Red kite (SCHEDULE 1, Annex I) Kingfisher (amber, SCHEDULE 1, Annex I) Reed bunting (amber, UK BAP) Bullfinch (amber, UK BAP) Meadow pipit (amber) Teal (amber) Kestrel (amber) Dipper (amber) Willow warbler (amber) Swift (amber) House martin (amber) Tawny owl (amber) Little egret (Annex I) I have seen common toads (*UK BAP Priority Herptile Species*) and brown hares (*UK BAP Priority Terrestrial Mammal Species*). Great crested newts and bats are present on site. There are badger setts and fox earths. Badgers are protected under the *Protection of Badgers Act 1992* and there is a particularly large sett in Skerningham Community Woodland. Although my sighting of a wall butterfly was just over the river, I know a local resident has seen, photographed and likely recorded the presence of one in Skerningham - a *UK BAP Priority Terrestrial Invertebrate Species*. Its conservation status is classed as "high" because the species has suffered severe declines. Peregrine (SCHEDULE 1, Annex I), marsh harrier (amber, SCHEDULE 1, Annex I), ring ouzel (red, UK BAP), barn owl (SCHEDULE 1) are some other birds I've seen over the river to the north but still close by. Roe deer, muntjac deer, common buzzard, treecreeper, sparrowhawk, jay, grey heron, cormorant, weasel, stonechat - there's always something to see and learn about over Skerningham.

This is just a snapshot of the rich biodiversity, spotted through an amateur's eye.

#### Question 4

##### Changes Sought

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Skerningham must be removed from the Local Plan in order to make it sound otherwise the town and its residents will lose the best countryside on offer for quiet recreation. Wildlife is thriving in Skerningham because it is significantly tranquil. Draw people in for outdoor community events, let children go to forest school here, install artwork and sculptures as the Council and an artist planned to do in 2008, depicting the start of the 1901 journey of the Durham Ox, get residents learning about and appreciating the natural world while at the same time improving fitness and lowering stress. This is what Skerningham lends itself to, not many more houses and the associated infrastructure the town doesn't yet need.

#### Question 5

##### Attendance at Examination Hearings

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