

## Comment

**Consultee** Mrs Pauline George (1250868)

**Email Address** [REDACTED]

**Address** [REDACTED]  
[REDACTED]  
[REDACTED]

**Event Name** Darlington Local Plan 2016-2036 (Regulation 19)

**Comment by** Mrs Pauline George (1250868)

**Comment ID** DBLPPS202

**Response Date** 16/09/20 11:35

**Consultation Point** Policy DC 1 Sustainable Design Principles and Climate Change (Strategic Policy) ([View](#))

**Status** Processed

**Submission Type** Letter

**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)** . Positively prepared

### 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.**

The plan does not enforce the use of energy efficient measures and low carbon technologies but it will encourage them. Developers consider energy efficient measures such as solar panels and other technologies such as heat pumps as too expensive to include on new properties, indeed recent developments within the Borough have none of these measures. There is no mention in the plan of what energy efficient measures will be encouraged or how these will be enforced to minimise the effects of climate change.

In 2018 Darlington Borough Council declared a climate change emergency. This plan shows no evidence in trying to mitigate that emergency; in fact Policy H10 only goes to exacerbate it with its rural location and reliance on car journeys to get to the centre of town or to work. Given the extent of

the development at Policy H10, this plan will not minimise the impact of climate change and will only go to increase its effects further.

#### Question 4

##### Changes Sought

**Please Note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. There is the opportunity to attach Word or PDF files before submitting your comment.

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We would advocate that the plan enforces the use of energy efficient measures and low carbon technologies on all new developments and specifically details what these will be.

That Policy H10 is reviewed given the detrimental effect its increased car journeys will have on the climate and the objective of minimising the effects of climate change.

#### 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

<b>Consultee</b>	Mrs Pauline George (1250868)
<b>Email Address</b>	[REDACTED]
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<b>Event Name</b>	Darlington Local Plan 2016-2036 (Regulation 19)
<b>Comment by</b>	Mrs Pauline George (1250868)
<b>Comment ID</b>	DBLPPS203
<b>Response Date</b>	16/09/20 11:42
<b>Consultation Point</b>	Policy H 1 Housing Requirement (Strategic Policy) ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.4
<b>Question 1b</b>	
<b>Do you consider that the Local Plan sound?</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>	<input type="checkbox"/> Positively prepared <input type="checkbox"/> Justified <input type="checkbox"/> 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.**

The calculation of housing need does not follow the standard method as required by the NPPF. It does not clearly demonstrate, using well evidenced and justifiable methods, that exceptional circumstances exist that would justify an alternative approach.

The NPPF states that policies should be clearly written and unambiguous; however, this does not seem to be the case with the Housing Requirement calculation. How local administrative data such as NHS patient registers, the amount of school children and those aged over 65 is used to justify that exceptional circumstances exist to deviate from the standard methodology is not clear. There is no transparent explanation of why the local administrative data increases the housing need by over 100% of the standard methodology.

The NPPF also suggests that exceptional circumstances may exist where current market signals indicate such a deviation to be exceptional. The Strategic Housing Market Assessment 2017 commissioned by Darlington Borough Council stated that on the whole market signals do not indicate any need for housing adjustment. There are therefore no justifiable exceptional circumstances which exist to justify the increased housing requirement.

There is no evidence founded on facts which is apparent in the plan to support economic growth, or of the 7,000 full time jobs included in the plan. The SHMA 2017 refers to these jobs as 'aspirational'. As they are 'aspirational' they do not then meet the criteria of exceptional circumstances that exist which would give rise to the need for an increase in the housing requirement.

The impact of Brexit on the economy or the housing requirement has not been considered, nor has the devastating effects that Covid-19 has had on the economy or any forecast growth. The plan is therefore not current or up to date with its estimates and is not founded on facts existing at this current time.

#### Question 4

##### Changes Sought

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I would expect to see a transparent, justifiable and easily understandable demonstration of why 492 dwellings are required broken down into a calculation identifying what the standard methodology calculates, and how each element of the local administrative data increases this figure and a description of how they can be categorised as 'exceptional'.

Given the impact of Covid-19 and the impacts of Brexit I would expect to see the estimates included in the plan with regards to the housing requirement and economic growth reviewed to make them more 'current' and to take into account these impacts.

#### 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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**Event Name** Darlington Local Plan 2016-2036 (Regulation 19)

**Comment by** Mrs Pauline George (1250868)

**Comment ID** DBLPPS204

**Response Date** 16/09/20 11:48

**Consultation Point** Policy H 10 Skertingham - Strategic Site Allocation (Strategic Policy) ([View](#))

**Status** Processed

**Submission Type** Letter

**Version** 0.4

**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)**

- Justified
- 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.**

The proposal to allow the loss of green space in the Skertingham Strategic Allocation directly conflicts with policy ENV4, in particular point G. This loss of space would cause significant harm to the character and appearance of the area. The Darlington Landscape Character Assessment 2015 concluded that this area is unlikely to accommodate further development without altering its character.

The proposed development could potentially sit on land that was identified by Darlington Borough Council as a 'Jewel in the Crown' in their 'Rights of Way Improvement Plan' with access to very high grade 'quality' countryside'. It would therefore adversely affect the recreational needs of all residents of the Borough.

Policy H10 directly conflicts with policy IN1 as it will result in the loss of existing footpaths and impair their functioning for recreational purposes.

Policy H10 does not demonstrate principles contained in Policy IN1. It is remote to the town centre, and does not demonstrate connectivity for pedestrians and cyclists to make cycling and walking the first choice for short journeys.

The NPPF states that plans should be sustainable. Policy H10 is not sustainable as the Council have not been able to demonstrate that the already overloaded road infrastructure in and around Whinfield will be able to cope with an increase of traffic up to 180% of its current volume.

The concerns raised by Highways England in the draft Local Plan Consultation 2018 regarding the impact on the strategic road network of Policy H10 do not appear to have been addressed clearly in this plan.

#### Question 4

##### Changes Sought

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To make this plan sound I would expect that there be no conflict with policy ENV4, the Darlington Landscape Assessment or policy IN1. I would also expect a clear explanation of how the Council intends to mitigate the increase in volume of traffic on already full to capacity local roads. If Policy H10 is unsustainable and these conflicts cannot be removed or explanations provided then Policy H10 should be removed from the Local Plan.

#### Question 5

##### Attendance at Examination Hearings

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#### Question 6

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