

## Comment

<b>Consultee</b>	Major Frederick Greenhow MBE (1164361)
<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>	Major Frederick Greenhow MBE (1164361)
<b>Comment ID</b>	DBLPPS281
<b>Response Date</b>	16/09/20 15:15
<b>Consultation Point</b>	Policy H 1 Housing Requirement (Strategic Policy) ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.4
<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>	

**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 figures provided by DBC for the number of dwellings required are greatly over estimated compared to the ONS figures of dwellings required per annum. DBC estimate an annual figure of 492 dwellings compared to the ONS figure of 177 per annum. This would lead to believe that DBC estimate that there is a requirement for well over 10,000 houses required during the planning period. Other local authorities (LA) in our surrounding area, have made very little difference in regards to their own estimations and that of the ONS. So why has DBC got such a significantly high difference with the ONS figures? Have the ONS got their estimation of the requirement in the DBC area seriously wrong, when other LA's agree with ONS figures? The methodology used by DBC to produce these figures is significantly flawed and is based on assumptions with no hard facts or justification. DBC have received lots of well thought arguments, which appear to be totally ignored. I myself have requested to the leader of DBC on two occasions to discuss the Draft Local Plan, whilst members of the public were present so that DBC could inform the public of their justification, on both occasions, that request was refused.

When reading about the projection of 7,000 new jobs coming to the Darlington area, even if this prediction was to materialise, how does 7,000 new jobs equate the need of 10,000 plus new dwellings? The maths simply do not add up. Yes we now have a new Amazon warehouse, been certainly in today's climate, people will be struggling to hang onto the jobs they have got, never mind all this 'predicted' new employment. I therefore advocate that this policy is not properly prepared and it should be amended to reflect what is actually needed and not DBC aspirations.

#### **Question 4**

##### **Changes Sought**

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To improve the soundness of the Housing Allocation (H1), and due to the greatly over-estimation of dwellings required, what is referred to as the Skerningham Strategic Allocation, should be totally removed from the Housing Allocation. It is not required to meet current and future demand for at least the next 10 years. The plan should be reviewed in any case a minimum of every 5 years.

#### **Question 5**

##### **Attendance at Examination Hearings**

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

##### **Question 5a**

##### **Participation at Examination Hearings**

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**If you wish to participate at the examination hearings, please outline why you consider it to be necessary?**

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**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>	Major Frederick Greenhow MBE (1164361)
<b>Comment ID</b>	DBLPPS283
<b>Response Date</b>	16/09/20 15:15
<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>	Email
<b>Version</b>	0.4
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Figures produced by DBC for housing is greatly over-estimated compared with ONS figures. If figures used by ONS were used it would make the plan more sound, there is enough allocation already so therefore in reality the Skerningham Strategic Allocation is not required at all for housing during the life of the Plan. Also DBC should follow national guidelines, where development should only happen in countryside as a last resort, not a first resort as can be seen here by DBC.

**Skerningham Strategic Allocation**

When reading DBC's own 'Strategic Housing Land Availability Assessment' (SHLAA) dated 2015, which still appears on their website, it clearly states that Skerningham is not suitable for housing development. In fact Skerningham is often referred to by DBC in various documents due to its beautiful countryside, wildlife and fauna as their 'Jewel In The Crown'. They mention in the above report that it is not suitable for development for a host of reasons, significantly due to the risk of flooding and the potential high risk of contamination from the Barmpton Quarry landfill site. So how can a site that is referred to as the 'Jewel In The Crown' and mentioned in their own SHLAA as not be suitable for housing development, 5 years later is now considered for such a huge housing development? It appears that they are now strongly ignoring their own advice.

It will also mean the loss of a very accessible area, with a huge change to the beautiful landscape, which is used by many across the whole of the Darlington area for walking, dog-walkers, horse riders and cyclists alike. This 'Jewel In The Crown' has proved invaluable, none so than now for both people's physical and mental health. It will also have a devastating effect with the loss of wildlife including birds on the 'Red List' and fauna including rare Black Poplar trees, all of which seriously contradicts with the Plan's aim of enhancing the green infrastructure and protecting wildlife.

As part of this proposal is the movement of Darlington Golf Course. Why? The current golf course is well established and well used. To move the Golf Course, would mean having to plant a new woodland which could take 20 years plus to establish and therefore it would be both unrealistic and unachievable during the life of the Plan, and also negates DBC's own policies on protection of trees and green spaces.

Driving along Barmpton Lane, Whinbush Way, Whinfield Road, especially at peak times will not be able to cope with any huge increase of traffic as a consequence of any large development. Residents especially who live along Whinfield road already suffer greatly with air pollution and noise from today's traffic. The infrastructure in this area is already inadequate, never mind having to deal with such a potential increase of traffic with people driving to / from work and school runs etc.

**Question 4**

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Firstly to make the plan more sound and assist DBC in achieving both their climate change targets and implementing their other relevant green policies, Skerningham Strategic Allocation should be completely removed from the Plan. It is not required for housing development and would only damage this outstanding area of countryside and the wildlife and fauna within it.

Likewise there is no requirement to relocate the perfectly serviceable and well used existing Darlington Golf Course and should also be removed from the Plan.

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<b>Comment by</b>	Major Frederick Greenhow MBE (1164361)
<b>Comment ID</b>	DBLPPS284
<b>Response Date</b>	16/09/20 15:15
<b>Consultation Point</b>	Policy ENV 6 Local Green Space ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
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I strongly object to the fact that DBC are rejecting applications for certain Local Green Spaces in the Local Plan. My main objection in particular is Skerningham Countryside Park (originally referred to as LGS04/LGS013 in the Draft Plan). Having looked at the criteria, this indeed appears to meet the criteria for it to be designated a Local Green Space. As the only publicly accessible woodland to the North of Darlington, it is highly valued not only by local residents, but also by visitors - who enjoy various physical activities as part of their health and well-being. As a priority DBC and any other Local Authority (LA ) should highlight and designate Local Green Spaces for the whole community to enjoy and benefit from, and adjust their Masterplan accordingly.

It is good to note that Springfield Park has been removed from the Skerningham Allocation in the Draft version of the Plan and is to be designated as a Local Green Space (LGS02). What is not clear however is it to be left untouched and protected against and used as any kind of access road for any future development plans. It is a highly valued community asset, very well used and needs complete protection from any likely development.

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Skerningham Countryside Park (originally labelled LGS04/LGS013 in the Draft Plan) should be designated as a Local Green Space in the Local Plan in table 9.1.

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