

Comment

Consultee Mr Jeremy Horner (1163755)

Email Address [REDACTED]

Address [REDACTED]

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

Comment by Mr Jeremy Horner (1163755)

Comment ID DBLPPS69

Response Date 11/09/20 20:48

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

Status Processed

Submission Type Web

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.

In relation to Policy H10 I do not believe that the plan is justified or consistent with the NPPF. I consider policy H10 to be unsound for the following reasons. I believe that the proposal to allow the loss of green space in the Skertingham Strategic Allocation directly conflicts with Policy ENV4, in particular point G as it can be demonstrated that this loss of space would cause significant harm to the character and appearance of the area. According to the Darlington Landscape Character Assessment 2015 the landscape in this area is unlikely to accommodate further development without altering its character. This 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, countryside which has been used extensively by residents during lock-down. It would therefore adversely affect the recreational needs of all residents of the Borough. Policy H10

also directly conflicts with policy IN1 in so far as it will result in the loss of existing footpaths and impair their functioning for recreational purposes. Policy H10 does not demonstrate other principles contained in Policy IN1 as, because of its remoteness to the town centre, it 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. I believe that 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. This is based only on 1,800 houses and not the full 4,500 homes envisaged in this plan. I note and support the comments made by Highways England in response to the draft Local Plan Consultation in 2018, namely their concerns regarding the potential impact of the Strategic Road Network of Policy H10. None of these concerns appear to have been addressed in this Local Plan submission.

In respect of the specific proposal to move Darlington Golf Course I cannot see how this can be justified on any grounds, since the woodland already there is the only publicly accessible community woodland to the north of Darlington. Furthermore the argument that the Plan will produce a net increase in community woodland is unrealistic and unachievable during the life of the Plan, since newly planted woodland will take in excess of 20 years to establish. A new golf course may be "green" but the majority of the area will be grass and not trees. In addition, as it is a private club the Plan in effect replaces publicly accessible countryside with a privately owned facility that will not be accessible to non-members. It also goes against Darlington Borough Council's own policies on protection of trees and green spaces. The existing golf course is perfectly serviceable and no valid reasons have been given for its relocation. When you research the Skerningham Plantation via the Darlington Borough Council website, one of the things highlighted is the presence of rare Black Poplar trees present in the woods that run alongside the river. It is highly likely these will be under threat from the mass tree-felling required to build the new golf course.

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.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues identified for examination.

Please set out what change(s) to the Local Plan you consider necessary to make it legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text.

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, which to date they have not. 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

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