

## Comment

<b>Consultee</b>	Mr Alan Hutchinson (1174541)
<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>	Mr Alan Hutchinson (1174541)
<b>Comment ID</b>	DBLPPS55
<b>Response Date</b>	10/09/20 12:20
<b>Consultation Point</b>	Policy ENV 6 Local Green Space ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<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>	

**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.**

LOCAL GREEN SPACES\* Springfield Park is an Asset of Community Value and the only park in this part of Darlington. I note that it 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), which is very welcome, but it must be left intact and protected against development and any kind of access road to the Skerningham Allocation if that proceeds.\* I object to DBC rejecting applications for certain Local Green Spaces in the Local Plan. In particular Skerningham Countryside Park (originally labelled LGS04/LGS013 in the Draft Plan) would appear to clearly meet the criteria to be a Local Green Space. It is the only publicly accessible woodland to the north of Darlington, it is highly valued by residents, and is very well used by local residents and visitors for their informal recreation. To dismiss it from the Plan because of the spurious reason that the area is covered by a masterplan which has to take precedence is not good enough. The designation of Local Green Spaces should come first on their merits, then the masterplan adapts to what is already there.

#### **Question 4**

##### **Changes Sought**

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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. \* This will afford it protection for the continued use by the public and improve the soundness of the Plan because (a) the green space is in reasonably close proximity to the community it serves, (b) the green area is demonstrably special to the local community and holds a particular local significance because of its beauty, recreational value, tranquility and richness of its wildlife, (c) the green area concerned is local in character and is not an extensive tract of land.

#### **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?**

A clear and detailed exposition of my comments in person is more effective than a written submission. I would also wish to attend to listen to the proceedings, in the public interest.

**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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<b>Event Name</b>	Darlington Local Plan 2016-2036 (Regulation 19)
<b>Comment by</b>	Mr Alan Hutchinson (1174541)
<b>Comment ID</b>	DBLPPS56
<b>Response Date</b>	10/09/20 12:33
<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>	0.3
<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>. Justified</li><li>. Consistent with national policy</li></ul>
<b>Question 3a</b>	
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HOUSING REQUIREMENT\* The DBC figures of 492 dwellings needed per year, leading to almost 10,000 dwellings being built across the Town are based on a methodology which deviates from that prescribed, without valid justification and is fatally flawed. \* These figures are based on estimates, assumptions and unknown quantities, are unsustainable and are almost 3 times bigger than the ONS figure of 177 dwellings per year. \* During the informal consultation stage of the Draft Plan, Darlington Borough Council received a large number of objections to this policy based on sound research by many reputable bodies and figures, but it has chosen to ignore completely the well-argued representations. I suggest that policy H2 does not comply with the Duty to Co-operate, is not legally compliant and it undermines many of the principles about development used in the rest of the Plan.

**Question 4**

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Policy H1 should be modified to replace the DBC figure of 492 in favour of the ONS figure of 177, and the number of houses to be built under the Plan should be adjusted accordingly. The use of the more accurate figures will improve the soundness of the Plan, make it legally compliant and it will have been more positively prepared as a result.

**Question 5**

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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** Yes, I request to be notified

**independent examination under section 22(3) of the regulations and to be notified of the adoption of the Local Plan?**

## Comment

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<b>Event Name</b>	Darlington Local Plan 2016-2036 (Regulation 19)
<b>Comment by</b>	Mr Alan Hutchinson (1174541)
<b>Comment ID</b>	DBLPPS57
<b>Response Date</b>	10/09/20 12:46
<b>Consultation Point</b>	Policy H 2 Housing Allocations (Strategic Policy) ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<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>	<input type="checkbox"/> Effective <input type="checkbox"/> Justified <input type="checkbox"/> Consistent with national policy
<b>Question 3a</b>	
<b>Your Comments</b>	

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HOUSING ALLOCATIONS\* Because of the grossly over-estimated DBC figures, in reality the Skerningham Strategic Allocation is not required at all for housing during the life of the Plan and thus this is ineffective in the delivery of the Plan.\* National guidelines say that development in the countryside should be a last resort but DBC are not being consistent with the NPPF by making Skerningham a priority for development instead.\* Table 6.3 lists the Skerningham Allocation as site 251 and is listed as being an "Urban Extension", yet the proposed developers for the area characterize Skerningham as a "Garden Village". An urban extension meets none of the requirements for a Garden Village, and is urban sprawl, so Skerningham is misplaced in table 6.3.

#### Question 4

##### Changes Sought

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Skerningham, site 251, should be totally removed from the Housing Allocation. This will improve the soundness of the Plan by correcting a misplaced allocation which is not required in any event.

#### Question 5

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#### Question 6

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<b>Event Name</b>	Darlington Local Plan 2016-2036 (Regulation 19)
<b>Comment by</b>	Mr Alan Hutchinson (1174541)
<b>Comment ID</b>	DBLPPS58
<b>Response Date</b>	10/09/20 12:49
<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>	Letter
<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>	
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<b>Question 2</b>	
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SKERNINGHAM STRATEGIC ALLOCATION

\* Darlington Borough Council's "Strategic Housing Land Availability Assessment (SHLAA)" from 2015, and still on their website, clearly concludes that Skerningham is not suitable for housing development, for a long list of 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. It is inconceivable such a short time after publication of the SHLAA that DBC should ignore their own conclusions and include Skerningham as a strategic site for large scale housing development.\* The grossly inflated housing requirement figures used to justify the need for this allocation mean that in reality it is not required in order to meet housing targets.\* It represents a large unnecessary increase in development limits into the countryside.\* It will irretrievably change the character and appearance of the land for the worse and Whinfield will change from being a ward bounded by countryside to being a suburb, surrounded by large-scale housing development, with considerable loss of amenity for the residents. \* It means the loss of most of the community woodland and public access which are highly valued, extensively used and easily reached by local residents for informal healthy recreation by walking, riding and cycling. This conflicts with the Plan's aim of improving the health and well-being of the Town's population. \* There will be loss of wildlife, including several species of bird which are on the 'red list', especially in Skerningham Woods, which conflicts with the Plan's aim of enhancing the green infrastructure and protecting wildlife.\* The proposal to move Darlington Golf Course into Skerningham Countryside Park cannot be justified on any grounds, since this is the only publicly accessible community woodland to the north of Darlington. The Plan proposal to produce a net increase in community woodland is unrealistic and unachievable during the life of the Plan, since newly planted woodland to replace that taken away will take 20-30 years to establish. It also negates Darlington Borough Council's own policies on protection of trees and green spaces. The existing golf course is perfectly serviceable, long-established, and well-used, and no valid reasons have been given for the supposed necessity for it to be relocated.\* Rare Black Poplar trees present in Skerningham Woods will be under threat from the mass tree-felling required to build the new golf course.\* There are several graves from the modern era in Skerningham Woods, which will be threatened with disturbance by a relocated golf course.

\* The road infrastructure in the north of the Town is already very busy, especially at peak times, and will not be able to cope with the consequent huge increase in traffic from the development, making it unsustainable. There will be an increase in pollution from noise, vehicles and light.

\* During the consultation on the Draft Local Plan, DBC received by far the largest number of objections to the inclusion of Skerningham as a zone for development, but they have chosen to ignore the results of that consultation. I suggest that this is not in the spirit of meaningful consultation or Duty to Co-operate, the policy has not been positively prepared to meet the needs of the residents of Darlington, and is not justified.\* The proposed developers are constantly referring to the Skerningham Strategic Allocation as a "Garden Village", but this terminology does not appear anywhere in the Deposited Plan in relation to Skerningham. As proposed, development at Skerningham would be urban sprawl, since it meets none of the criteria for a genuine and sustainable Garden Village. This is confusing and misleading for the public.

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\* Skerningham Strategic Allocation should be completely removed from the Plan as a zone for housing development and the rest of the Plan amended accordingly to remove all references to it as such.

\* The proposal to relocate the existing Darlington Golf Course to Skerningham Woods should be removed from the Plan under any and all circumstances, even if some modified form of the Skerningham Allocation were allowed to go ahead.

\* Skerningham Countryside Park should be designated as a Local Green Space and protected, under Policy ENV6.

\* These changes would improve the soundness of the Plan by assisting Darlington Borough Council in achieving their climate change targets and implementing their other relevant green policies.

## **Question 5**

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