

## Comment

<b>Consultee</b>	Mr Stephen Jenkins (1250924)
<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 Stephen Jenkins (1250924)
<b>Comment ID</b>	DBLPPS393
<b>Response Date</b>	16/09/20 18:09
<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>	0.5
<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
<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 Skerningham Allocation detailed in H2 of the Local Plan is environmentally destructive and is an unsustainable development and contradicts the Local Plan's own stated aims and objectives with respect to environmental and sustainability issues. The Local Plan is also a missed opportunity to really do something positive for the environment and the local community.

In the plan it is stated under **Section 2 Visions, Aims and Objectives** that the plan seeks to improve the amount of quality accessible greenspace and protect and enhance biodiversity. The planned development at Skerningham totally contradicts these stated aims. The area called the Skerningham Allocation consists of 492.19ha and is proposed to yield 4500 house plots. It currently contains an area of significant greenspace and biodiversity. Although the council have tried to dress this as a "Garden Village" you cannot remove 492.19ha of agricultural land, river banks and woodland and replace it with 'meaningful greenspace' and a very large housing estate. There are numerous species of birds and animals that are known to populate the area which include kingfishers, owls (tawny, little and barn), stonechats, flycatchers, linnets and many other species many of which will not inhabit a built environment, however many areas of 'green' the council add. The proposals also include the destruction of the Skerningham Community Woodland comprising some 12,000 trees. Many of these trees are fine examples of black poplar. The woodland is also the location of a natural graves site. The Council's own website makes the point that it is an important large nature reserve within easy walking distance of the town. How can this development possibly improve the quality and access to greenspace for the community as stated in the aims of the plan? It does beg the question whether the Council have done a thorough audit of the biodiversity of the site and estimated how it will be affected by the development.

The Brightwater Project supported by the Lottery Heritage Fund is attempting to restore and enhance the River Skerne catchment area. They have done a lot of work to improve the oxygen levels in the River Skerne to improve biodiversity. Their work includes the introduction of small flow restrictions to increase the velocity of the water and entrain more oxygen to encourage aquatic species. Polluted run-off from the vast new housing estate will undo all the valuable work done by the Brightwater Project and illustrates how the Local Plan fails in its Duty to Cooperate.

There is no mention of local employment provision for a development of 4500 houses making it a commuter estate of approaching 10k residents. The size of the proposed development represents almost 10% of the current population of Darlington in a single housing estate. Furthermore, details of proposed infrastructure are scant. How is a large estate of 4500 new homes going to be adequately linked to the town? What will the effect be on the already congested roads? It is a fair assumption that all of these homes will have one or more cars which will be necessary to reach any of the amenities the residents need such as schools, shops and employment. These issues are not socially, economically or environmentally sustainable and are totally out of line with current thinking.

Why is there not more provision in the Local Plan for the development of 'Brownfield Sites'? **Section 5.1.16 and 5.1.17** the Local Plan makes reference to Brownfield development but instead of requiring that this kind of regeneration is prioritised the plan almost excuses the avoidance of such sites. Over the last few years the town centre has come under extreme pressure and many buildings and shops are now empty. The decline has accelerated over the Covid-19 pandemic. The Local Plan should consider the development of housing close or even within the town centre and brownfield sites before the destruction of vast areas of green space such as the River Skerne catchment area at Skerningham.

The proposed Skerningham Allocation is neither socially, environmentally nor economically sustainable and will lead to the loss of productive agricultural land and wildlife habitats. It will create a vast 'bolt-on' housing estate on the outskirts of Darlington with scant amenities and a total dependence on cars.

#### **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.**

I propose:-

- . Remove the Skertingham Allocation from the plan
- . Make the use of brownfield sites a priority before the use of any greenfield site
- . Make use of vacant town centre sites for residential development

## **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