

## Comment

<b>Consultee</b>	Alan William Macnab (1164455)
<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>	Alan William Macnab (1164455)
<b>Comment ID</b>	DBLPPS112
<b>Response Date</b>	13/09/20 15:10
<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>	<input type="checkbox"/> Positively prepared <input type="checkbox"/> Effective <input type="checkbox"/> Justified <input type="checkbox"/> Consistent with national policy
<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 Government's Objectively Assessed Need (OAN) for housing in Darlington based on its sound formula that the need for new housing will be 177 houses each year whereas the Local Plan states that the need for new housing will be 492 houses each year and are based on estimates and assumptions. During the consultation stage on the Local Plan soundly based evidence was presented to justify the lower figure being adopted which were ignored.

**Question 4**

**Changes Sought**

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Policy H1 should use the OAN figure of 177 houses each year because it is soundly based and more accurate.

**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

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<b>Event Name</b>	Darlington Local Plan 2016-2036 (Regulation 19)
<b>Comment by</b>	Alan William Macnab (1164455)
<b>Comment ID</b>	DBLPPS113
<b>Response Date</b>	13/09/20 15:10
<b>Consultation Point</b>	Policy H 2 Housing Allocations (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>	<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.**

If the Government's Objectively Assessed Need (OAN) of 177 houses each year for Darlington there will be no need for the Skerningham Strategic Allocation National planning guidelines states that development in the countryside should be a last resort. Indeed, Darlington Borough Council's own Strategic Housing Land Availability Assessment from 2015. The SLAA clearly states that Skerningham is not suitable for housing development and it gives the reasons why it is unsuitable and there has been no reasons given why Skerningham has been allocated for development in the Local Plan. There is inconsistency in the Borough Council's planning policy which is concerning.

There is also ambiguity in that Table 6.3 lists the Skerningham Allocation as site 251 and is listed as being an "Urban Extension", but the proposed developers for the area state that Skerningham is a "Garden Village". The requirements set out by the Government for Garden Villages do not appear to be met by defining Skerningham as a Strategic Allocation in the Local Plan but it is urbanisation of the countryside to the north and north east of Darlington which is much valued, used and respected and will not help to deliver the Borough Council's Climate Change Pledge targets.

**Question 4**

**Changes Sought**

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Skerningham, site 251, should be 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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<b>Event Name</b>	Darlington Local Plan 2016-2036 (Regulation 19)
<b>Comment by</b>	Alan William Macnab (1164455)
<b>Comment ID</b>	DBLPPS114
<b>Response Date</b>	13/09/20 15:10
<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
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**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.**

- 1 Policy H10 conflicts with Darlington Borough Council's:
  - 1.1 Strategic Housing Land Availability Assessment from 2015. The SLAA clearly states that Skerningham is not suitable for housing development and it gives the reasons why it is unsuitable. The reasons include that it is a rural green field site, flooding loss of countryside and significant visual impact, detrimental effect on the tranquillity of the area and the need to protect habitats which exist in Skerningham. There is the possibility of protected species such as great crested newts and bats in Skerningham. The Skerningham Woodland is a Site of Nature Conservation Area.
  - 1.2 Darlington Green Infrastructure Strategy 2013 to 2026. The Guide to the Strategy specifically refers to plans to develop Skerningham Countryside Park which includes:
    - . Extending the cover and mix of broad-leaved semi natural woodland and hedgerows particularly between Green Lane and Skerningham, to enhance biodiversity value;
    - . Promoting agri-environment schemes to create a wildlife friendly landscape with biodiversity rich field margins;
    - . Extending the rights of way network and permissive routes within Skerningham, to the urban area and in the Ketton countryside, particularly for family cycling and walking to encourage more active use by different user groups;
    - . Improving the visitor experience; a small car park next to the track off Barmpton Lane and more signs will improve access and orientation for those with limited mobility and people with disabilities. Interpretation will aid understanding of sites of interest like Ketton Bridge;
    - . In partnership with landowners and farmers, encouraging rotational coppicing to improve the availability of biofuel locally, to create a varied, productive landscape between the edge of the urban area and Skerningham woodland
  - 1.3 Trees and Woodlands Strategy. The aim of the strategy is 'To proactively manage and enlarge the tree population of the Borough of Darlington in order to protect our historical heritage of trees and provide a valued environmental amenity for future generations.'
  - 1.4 . Climate Change Declaration by increasing emissions from properties and increased vehicle movements from and to the Garden Village, increased pollution and congestion on our roads.
- 1 The plans for the Skerningham Strategic Allocation in Policy H10 show that the new golf course will be located in the Skerningham Community Woodland which is given as a woodland on the DEFRA Community Woodland map. This will result in mature trees being felled to prepare the golf course. More seriously, the woodland is a sacred and a tranquil site where two graves are located at least. Destroying the woodland and creating a golf course and disturbing the graves in the woodland would be highly insensitive and extremely disrespectful
- 2 The plans for the Skerningham Strategic Allocation in Policy H10 will:
  - . destroy the existing green infrastructure of trees, woodland, hedgerows, footpaths, bridleways and open fields;
  - . blur the distinctiveness of existing communities and by expanding the communities' new challenges for the existing communities will be created. Will Skerningham be a separate community or will it be part of Whinfield, Great Burdon and Barmpton which surround it?
  - . destroy the open countryside between settlements and destroy the Skerningham countryside's intrinsic character and beauty because it will be urbanised.
  - . destroy the Skerningham countryside which is much valued and cherished by the people of Darlington of all ages for recreation, as a contribution to their good health and well-being and for children and young people now and in the future to learn, appreciate, respect and protect the natural environment.

#### **Question 4**

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Policy H10 should be entirely deleted from the Local Plan

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<b>Event Name</b>	Darlington Local Plan 2016-2036 (Regulation 19)
<b>Comment by</b>	Alan William Macnab (1164455)
<b>Comment ID</b>	DBLPPS554
<b>Response Date</b>	16/09/20 10:29
<b>Consultation Point</b>	Policy H 10 Skerningham - Strategic Site Allocation (Strategic Policy) ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.8
<b>Question 1a</b>	
<b>Do you consider that the Local Plan is Legally compliant?</b>	No
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<b>Do you consider that the Local Plan sound?</b>	No
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Policy H10 also conflicts with Darlington Borough Council's own Planning for the Protection of European Sites Habitat Regulations Appropriate Assessment: Screening Report which is under the heading of the Darlington Borough Local Plan 2016-2036.

The impact assessment of Policy H10 of the Screening Report makes the following admissions:

a. Air Quality

The impact assessment admits that there will be some impact on air quality. The aim should be to improve the air quality but the Skerningham Strategic Allocation will worsen the impact on air quality. More seriously there is no mention in the impact assessment of the effects on the air quality of residents who border the Skerningham Strategic Allocation and will be affected by any deterioration in air quality.

There is no evidence given that the measures which are proposed such as the construction and design of buildings, more sustainable transport or the creation and enhancement of existing green infrastructures will in fact minimise the impact on air quality. Quite the reverse. The existing green infrastructure will be largely destroyed and the new infrastructure will take many years to mature.

b. Habitats or Species Disturbance

The impact assessment makes the shocking admission that "Development will result in the loss of large areas of agricultural land that could have an impact on migratory birds."

There is no mention whatsoever of the animals who have made Skerningham and Ketton their home such as the foxes, rabbits, hares, deer, or squirrels, moles and badgers etc. Skerningham is rich in wild life and natural habitats which will be destroyed by the Strategic Allocation and once they are gone they will not come back and there will be significant and irreparable damage done to the

The impact assessment admits that fields along the south side of the river Skerne and large swathes of agricultural land exists to the north and east of the site will be retained which it is hoped that animals, birds and other species will migrate to. Nature does not work like that. The building work will disturb them and they will leave never to return and the people in north and north east Darlington will be that much poorer.

The impact assessment also states that "under the NPPF and policy ENV 7 sites will be expected to deliver a net gain in biodiversity as a result of development. The policy stipulates that the site should deliver a net gain in the area of community woodland on the site, retain and enhance hedgerows and trees and provide a pattern of interconnected green infrastructure." Where is the proof that this will happen? The plans proposed that the Community Woodland will be destroyed for a golf course. The Community Woodland is a burial site which must not be disturbed. Trees, hedgerows and the green infrastructure take years to grow and mature.

c. Climate Change

The impact assessment admits that there will, be some impact on greenhouse gas emissions and claims that other plans in the plan will reduce the impact of the Skerningham Strategic Allocation on climate change but there is no empirical evidence presented that this will, in fact, reduce the effects on climate change.

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