

## Comment

<b>Consultee</b>	Mrs Christine McLay (1250865)
<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>	Mrs Christine McLay (1250865)
<b>Comment ID</b>	DBLPPS200
<b>Response Date</b>	16/09/20 11:10
<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>	0.4
<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.**

I consider Darlington Borough Council are using unnecessarily high housing figures and consequently object to the housing allocations, as they stand, in this Proposed Submission Local Plan, in particular sites 41 and 249 Coniscliffe Park.

I also oppose the use of productive agricultural land for such large scale housing allocations. The loss of agricultural land and habitats for wildlife in these areas will seriously affect the Council's stated Vision in this Plan, resulting in unsustainable development that does not conform to the environmental aspect of sustainable development mentioned in the NPPF.

The proposed housing target of 482 hpa is far in excess of the figure required, under the government's standard method for calculating the ONA

The Low Coniscliffe and Merrybent Neighbourhood Plan was 'made' in June 2019. The plan was informed by a HNA and undertaken by AECOM. The HNA prepared, estimated an ONA for the Plan area by considering five different sources:

- . The adopted Local Plan requirement (2011 Core Strategy)
- . The emerging Local Plan (strategic Housing Market Assessment)
- . National household projections (2014 based)
- . Past dwelling completion rates (2001-2011 and 2011+) and
- . Draft standard national methodology (2017)

DBC do not appear to have given consideration to this robust local HNA in their calculation of the housing requirements for the LC&M neighbourhood area.

It would appear the objections raised by the Low Coniscliffe and Merrybent Parish Council, to sites 41 and 249 at Coniscliffe Park have been ignored and I consider Policy H2 has not been prepared in accordance with the SCI, nor does it fulfill the duty to co-operate or be transparent.

The only justification for these sites, would appear to be to deliver an excessive housing requirement, which raises concern that the local plan contains no clear policy to guide the future development of over 1500 new homes at Coniscliffe Park and without such policy guidance, the proposed strategic allocations are not effective.

If determined that further land needs to be allocated and, to be consistent with National Policy, DBC should look to brownfield land. Such redevelopment would lead to potential rejuvenation of the historic market town of Darlington and save greenfield land from unnecessary development.

#### **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 amend the plan in line with Low Coniscliffe and Merrybent Neighbourhood 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

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<b>Comment by</b>	Mrs Christine McLay (1250865)
<b>Comment ID</b>	DBLPPS201
<b>Response Date</b>	16/09/20 11:23
<b>Consultation Point</b>	Policy ENV 3 Local Landscape Character (Strategic Policy) ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.4
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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.**

Legal Compliance

I do not consider that Policy ENV3 has been prepared in accordance with the SCI. One of the principles of the adopted SCI, is that the Council will ensure that involvement of the public and other stakeholders is effective, however, it would appear the objections of the Low Coniscliffe and Merrybent Parish Council to the lack of designation of a rural gap between Darlington and Low Coniscliffe, have been ignored .

Soundness

The Local Plan must be positively prepared, justified, effective and consistent with National Policy, however, whilst the Parish Council strongly support the principles of Policy ENV3, they object to the notable omission of reference to retaining the openness and green infrastructure functions of the rural gap between Darlington and the villages of Low Coniscliffe and Merrybent. The Vision of the LC&M Neighbourhood Plan - 'made' June 2019 - is clear that, whilst the villages will maintain their individual identities, will remain a gateway to Darlington but visually distinct and separate from the conurbation.

Not identifying a rural gap between the conurbation and the villages of Low Coniscliffe and Merrybent, undermines the Vision of the Neighbourhood Plan and Local Plan and is contrary to the principles of sustainable development.

Justified

The importance of rural villages to the character of the Borough is highlighted within the Vision and Objectives of the Local Plan, however, the lack of identification of a rural gap in such close proximity to the conurbation, is not justified.

Effective

Policy ENV3 seeks to maintain the character and local distinctiveness of the Borough, however, the lack of identification of a rural gap between conurbation and the villages of Low Coniscliffe and Merrybent, will result in the policy not being effective.

Consistent with National Policy

By not identifying a rural gap between the conurbation and the villages of Low Coniscliffe and Merrybent, there is a risk that future development within this area would not protect and enhance the landscape character, setting and identity of the area. It could also risk the loss of connectivity of the green infrastructure network, as well as the protection and enhancement of biodiversity and, therefore, not consistent with National Policy.

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