

## Comment

**Consultee** Judith Murray (1164497)

**Email Address** [REDACTED]

**Address** [REDACTED]  
[REDACTED]  
[REDACTED]

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

**Comment by** Judith Murray (1164497)

**Comment ID** DBLPPS185

**Response Date** 15/09/20 08:47

**Consultation Point** Policy DC 1 Sustainable Design Principles and Climate Change (Strategic Policy) ([View](#))

**Status** Processed

**Submission Type** Email

**Version** 0.5

**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)** . Positively prepared

### 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.**

I object to this on the following grounds:

In relation to Policy DC1, in particular, para 5.1.8, I do not believe that this plan has been positively prepared as it will not minimise the effect of climate change and does not appear to have this as an objective.

***I consider Policy DC1 para 5.1.8 to be unsound for the following reasons.***

In 2018 Darlington Borough Council declared a climate change emergency, however, this plan does not demonstrate how Darlington will mitigate that emergency. The building of 9,840 dwellings many of which are in car reliant locations will only add to the climate problem. Policy H10 is a massive

development of 4,500 homes and given its rural location, residents will be forced to use cars to get to the centre of town or to work. This does not go any way to the objective of minimising climate change.

Recent housing developments within the Borough have not encouraged the use of energy efficient measures such as solar panels as developers consider these an additional expense. The government has a commitment to banish the installation of gas boilers in new builds by 2025 but this plan makes no reference the use of technologies such as Ground Source Heat Pumps as a strategic design principle. In fact there is no detail given of exactly what energy efficient measures will be encouraged, and the plan says 'encouraged' not enforced so what guarantees does this plan have to ensure that new developments will actually include energy efficient measures – in its current format none at all, meaning this policy is somewhat null and void!

#### Question 4

##### Changes Sought

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I would encourage the Council to ensure that the plan guarantees the use of energy efficient measures such as solar panels etc on all new developments.

I would also advocate a review of Policy H10 as the unavoidable increase in traffic, especially in the Whinfield Ward area, will have a detrimental effect on the climate and will only exacerbate the effects of climate change.

#### 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

**Please note** the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearings.

**If you wish to participate at the examination hearings, please outline why you consider it to be necessary?**

The points I have raised in my Representation relate mainly to the impact the Housing Requirement and Skerningham Strategic Allocation will have on the Whinfield area. As a resident of the Whinfield area I would seek to participate in the Examination Hearing to be given the opportunity to express my concerns about the soundness of the Local Plan.

#### 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

**Consultee** Judith Murray (1164497)

**Email Address** [REDACTED]

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

**Comment by** Judith Murray (1164497)

**Comment ID** DBLPPS186

**Response Date** 15/09/20 08:47

**Consultation Point** Policy H 1 Housing Requirement (Strategic Policy) ([View](#))

**Status** Processed

**Submission Type** Email

**Version** 0.7

**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)**

- Positively prepared
- 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.**

***I consider Policy H1 to be unsound for the following reasons.***

The standard methodology for calculating housing need, as required by the NPPF has not been followed and there is no justifiable or evidenced information that exceptional circumstances exist that would justify an alternative approach. The standard methodology produces a yield of 3,476 new dwellings over the plan period. Housing commitments at present stand at 4,974, which is more than sufficient to cover the plan period. Housing requirements in the plan are 9,840 which are 283% more than required. There is no justification in the plan for this level of increase.

I cannot see any apparent reference in the Plan to the use of brownfield sites. The NPPF states that as much possible use should be made of previously developed brownfield land, however, the proposed sites in the Plan are mostly green spaces and therefore contradict this NPPF policy.

The NPPF states that policies relating to housing requirements should be clearly written and unambiguous, however, when trying to evidence why Darlington needs to move so drastically away (over 100%) from the standard methodology there is no clear evidence of why it needs to do so. The housing requirement is based upon the Strategic Housing Market Assessment 2017, which uses local administrative data as a justification from moving away from the standard methodology but which does not clearly demonstrate why such a move is needed. That particular report also states that much information from the 2015 Housing Market Assessment is still retained, so exactly how applicable is that data given the current circumstances. The NPPF advises that exceptional current circumstances are reflected in the Plan, however, from the evidence used, this does not appear to be the case.

The housing requirement is also based on an economic growth figure of 7,000 additional full time jobs. This figure is not supported by the 2017 SHLAA which says that these 7,000 additional jobs are aspirational and include both full time and part-time workers. When one considers this with the jobs lost over recent years in the Darlington area are these 'new' jobs or jobs to replace those already lost? If they are to a great extent, jobs to replace those already lost, how then does that justify the need to build more houses. Those who already live in the Borough without jobs would surely go some way to fill these vacant positions?

The impacts of both Brexit and Covid-19 have in no way been considered in this plan, a plan which is supposed to reflect current circumstances. Covid-19 in particular will have devastating long-term effects on our economy and potentially change the way in which we all work. People may work for a business in Darlington, but they may not need to live here in order to carry out their duties. Covid-19 creates a whole new landscape for working, but this plan does not consider that at all.

The 'exceptional circumstances' which Darlington say exist to support an alternative approach to the standard methodology are not justifiable or indeed evidenced based, and therefore do not meet the NPPF's requirements.

Assumptions and guesswork are not evidenced backed support for economic growth, and certainly not evidence for using an alternative method when calculating housing need.

#### **Question 4**

##### **Changes Sought**

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##### ***To make this plan sound***

I would want to see a clear breakdown of the 492 dwellings per annum broken down by a starting point of the standard methodology of 177 dwellings per annum and then followed by evidenced and justifiable calculations to bring it to the 492 dwellings in the plan.

I would also ask that the basis for the housing requirement be reviewed in its entirety given the current and future impacts of Covid-19 and the impending outcomes of Brexit on the economy,

#### **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

*Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearings.*

**If you wish to participate at the examination hearings, please outline why you consider it to be necessary?**

The points I have raised in my Representation relate mainly to the impact the Housing Requirement and Skerningham Strategic Allocation will have on the Whinfield area. As a resident of the Whinfield area I would seek to participate in the Examination Hearing to be given the opportunity to express my concerns about the soundness of the Local Plan.

#### 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

**Consultee** Judith Murray (1164497)

**Email Address** [REDACTED]

**Address** [REDACTED]

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

**Comment by** Judith Murray (1164497)

**Comment ID** DBLPPS187

**Response Date** 15/09/20 08:47

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

**Status** Processed

**Submission Type** Email

**Version** 0.5

**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.**

***I consider policy H10 to be unsound for the following reasons.***

The proposal to allow the loss of green space in Policy H10 directly conflicts with Policy ENV4, point G, as this loss of space would cause significant harm to the character and appearance of the area. The Darlington Landscape Character Assessment 2015 report said that this area was unlikely to accommodate further development without altering its character. Darlington Borough Council have also identified this land as a 'Jewel in the Crown' in the Rights of Way Improvement Plan, with access to high grade 'quality countryside'. This very same countryside has been used extensively by many during the Covid-19 pandemic and in many ways has probably been a life-saver in stopping people going stir-crazy during lock-down. To then develop this land would adversely affect the recreational needs of the residents of the Borough.

Due to its remoteness from the town centre, Policy H10 does not achieve the principles set out in Policy IN1 as it does not demonstrate connectivity for pedestrians and cyclists, as these will not be the first choice for short journeys.

I question the sustainability of Policy H10. The road infrastructure in Whinfield and the surrounding area is already full to capacity and will not be able to facilitate an increase in traffic of up to 180% of its current volume. Should the full 4,500 houses be built this increase will more than double the volume, yet the Local Plan makes no reference on how the local infrastructure will be able to accommodate this?

I also note with interest comments made by Highways England in response to the Draft Local Plan Consultation 2018 with regards to their concerns Policy H10 will have on the Strategic Road Network. These concerns do not appear to have been addressed in this Local Plan, so one would question its sustainability.

#### Question 4

##### Changes Sought

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##### **To make this plan sound**

The conflict with Policy ENV4 and IN1 needs to be resolved.

A clear explanation of how the concerns of Highways England on the strategic road network needs to be provided along with an explanation of how the council intends to mitigate the increased volume of traffic on already full to capacity local roads in order to make this policy sustainable in the longer term.

#### Question 5

##### Attendance at Examination Hearings

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##### 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?**

The points I have raised in my Representation relate mainly to the impact the Housing Requirement and Skerningham Strategic Allocation will have on the Whinfield area. As a resident of the Whinfield area I would seek to participate in the Examination Hearing to be given the opportunity to express my concerns about the soundness of the Local Plan.

**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

**Consultee** Judith Murray (1164497)

**Email Address** [REDACTED]

**Address** [REDACTED]

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

**Comment by** Judith Murray (1164497)

**Comment ID** DBLPPS188

**Response Date** 15/09/20 08:47

**Consultation Point** Policy ENV 3 Local Landscape Character (Strategic Policy) ([View](#))

**Status** Processed

**Submission Type** Email

**Version** 0.5

**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

### 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.**

I object on the following grounds:

In relation to Policy ENV3 I do not believe that the plan is justified when taken into consideration with Policy H10 above.

***I consider policy ENV3 to be unsound for the following reasons.***

Policy ENV3 states that the area between Barmpton Village and Darlington should be retained. This is clearly not the case should Policy H10 be approved.

### Question 4

## Changes Sought

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### **To make this plan sound**

Policy H10 needs to 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?** 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?**

The points I have raised in my Representation relate mainly to the impact the Housing Requirement and Skerningham Strategic Allocation will have on the Whinfield area. As a resident of the Whinfield area I would seek to participate in the Examination Hearing to be given the opportunity to express my concerns about the soundness of the Local Plan.

## Question 6

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## Comment

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**Email Address** [REDACTED]

**Address** [REDACTED]

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

**Comment by** Judith Murray (1164497)

**Comment ID** DBLPPS189

**Response Date** 15/09/20 08:47

**Consultation Point** Policy ENV 7 Biodiversity and Geodiversity and Development (Strategic Policy) ([View](#))

**Status** Processed

**Submission Type** Email

**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

### 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.**

*I consider policy ENV7 to be unsound for the following reasons.*

ENV7 point F refers to wildlife friendly green spaces, parks and parklands to protect and improve wildlife value. The development of Policy H10 will destroy many of these wildlife friendly green spaces forever and is therefore in direct conflict with ENV7.

### Question 4

#### Changes Sought

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**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**

The policy should demonstrate how it will mitigate the conflict between Policy H10 and ENV7 point F or if it cannot then Policy H10 should be removed from the plan.

**Question 5**

**Attendance at Examination Hearings**

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**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?**

The points I have raised in my Representation relate mainly to the impact the Housing Requirement and Skerningham Strategic Allocation will have on the Whinfield area. As a resident of the Whinfield area I would seek to participate in the Examination Hearing to be given the opportunity to express my concerns about the soundness of the Local Plan.

**Question 6**

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## Comment

**Consultee** Judith Murray (1164497)

**Email Address** [REDACTED]

**Address** [REDACTED]  
[REDACTED]  
[REDACTED]

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

**Comment by** Judith Murray (1164497)

**Comment ID** DBLPPS190

**Response Date** 15/09/20 08:47

**Consultation Point** Policy IN 1 Delivering a Sustainable Transport Network (Strategic Policy) ([View](#))

**Status** Processed

**Submission Type** Email

**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)**  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.**

*I consider policy IN1 to be unsound for the following reasons.*

Policy IN1 conflicts with the delivery of Policy H10 as H10 does not demonstrate the delivery of a sustainable transport network.

### Question 4

#### Changes Sought

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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.

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***To make this plan sound***

The plan should openly demonstrate how a deliverable sustainable transport network will be delivered in relation to policy H10.

**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?**

The points I have raised in my Representation relate mainly to the impact the Housing Requirement and Skerningham Strategic Allocation will have on the Whinfield area. As a resident of the Whinfield area I would seek to participate in the Examination Hearing to be given the opportunity to express my concerns about the soundness of the Local Plan.

**Question 6**

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## Comment

Consultee	Judith Murray (1164497)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Judith Murray (1164497)
Comment ID	DBLPPS191
Response Date	15/09/20 08:47
Consultation Point	Policy IN 8 Broadband Infrastructure ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.6

### Question 2

**Do you consider that this part of the Local Plan is unsound because it is not: (tick all that apply)**

### 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.**

Policy IN8 relates to Broadband connectivity, which, whilst I do not disagree with this policy I would like to question the following;

- . Why has BT already commenced works on installing super-fast broadband to a development which has not yet even been approved?
- . This connection runs straight in front of properties that will abut Policy H10. These properties do not currently have access to super-fast broadband, and despite a connection running in front of their properties a by-pass has been installed so that these properties cannot access this super-fast broadband.
- . One of the principles of NPPF is that existing residents should not be at detriment – yet we are if we cannot also access this
- . Could the commencement of this work, prior to Inspector approval be classed as pre-determination?

### Question 5

#### Attendance at Examination Hearings

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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?**

The points I have raised in my Representation relate mainly to the impact the Housing Requirement and Skerningham Strategic Allocation will have on the Whinfield area. As a resident of the Whinfield area I would seek to participate in the Examination Hearing to be given the opportunity to express my concerns about the soundness of the Local Plan.

#### **Question 6**

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Yes, I request to be notified

## Comment

Consultee	Judith Murray (1164497)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	Judith Murray (1164497)
Comment ID	DBLPPS192
Response Date	15/09/20 08:47
Consultation Point	Figure 1.2 Stages of Preparation of of the Local Plan ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.6

### Question 2

**Do you consider that this part of the Local Plan is unsound because it is not: (tick all that apply)**

### 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.**

I would also like to comment on the timing of this Representation. This Representation is being conducted in the middle of a pandemic and predominantly via the internet and digital technology. A significant number of Darlington residents do not have internet access and are digitally excluded from this Representation. Despite asking Darlington Borough Council for an estimate of how many residents potentially have Internet access and can participate via the portal or email, they did not have a clue how many residents would actually be able to participate and make comment. Fair and proportionate engagement is in the interests of the NPPF, however, Darlington Borough Council feel that progressing with this plan is more important than ensuring that all residents have an equal and fair chance to participate. Interestingly enough, elections have not taken place this year due to Covid-19 restrictions, yet something as important to this Borough as the Local Plan Representation is being pushed forward.

Another point I would like to raise, regarding procedure, is about the information I received from Council officers in relation to the Local Plan's predecessor, The Making & Growing Places Plan. This plan was consulted upon in 2014 and subsequently scrapped in April 2016. Being part of a community organisation that invested a lot of time and valuable funds into the consultation for the Making &

Growing Places Plan, I contacted the Council to ask what would happen to all the comments raised in the consultation. I was told that these would be retained, used to inform the new Local Plan, and subsequently passed to the Planning Inspector as part of the new Local Plan process. During this Representation period I have checked with the new Head of Planning, Mr David Hand, to ensure that this was still the case, only to be told that it wasn't and basically that the comments raised in 2014 were not of consideration. I was also told that comments raised during the 2018 Local Plan consultation would be summarised by the Council and forwarded to the Inspector as part of the representation. Despite asking what this summary consisted of, I have received no response. One would therefore question exactly what comments the Council have chosen to summarise and include as part of this Representation?

## Question 5

### Attendance at Examination Hearings

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## Question 5a

### Participation at Examination Hearings

*Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearings.*

**If you wish to participate at the examination hearings, please outline why you consider it to be necessary?**

The points I have raised in my Representation relate mainly to the impact the Housing Requirement and Skertingham Strategic Allocation will have on the Whinfield area. As a resident of the Whinfield area I would seek to participate in the Examination Hearing to be given the opportunity to express my concerns about the soundness of the Local Plan.

## Question 6

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## **Proposed Submission Local Plan 2016-2036**

### **Representation**

**Name:** Whinfield Residents Association

**Address:**

**Tel No:**

**Email:**

Dear Sir/Madam

I am sending this response on behalf of Whinfield Residents Association and it is their Representation regarding the local Plan.

Whinfield Residents Association has over 90 members.

Whinfield Residents Association has listed below those specific policies within the Local Plan which we consider not to be 'sound' and our reasons for this. After each policy we have also listed the changes sought which we feel would make the plan 'sound'.

#### **Policy DC1 – Sustainable Design Principles and Climate Change (Strategic Policy)**

Whinfield Residents Association objects to this on the following grounds:

In relation to Policy DC1, in particular, para 5.1.8, we do not believe that this plan will minimise the effect of climate change and has therefore not been positively prepared with this objective in mind.

The plan will encourage the use of energy efficient measures and low carbon technologies but will not enforce them. Recent housing developments within the Borough have not encouraged energy efficient measures such as solar panels as these have been deemed too expensive or and added expense for developers to include on new properties. Other technologies such as Ground Source Heat Pumps are also not being installed despite the government's commitment to banish the installation of gas boilers in new builds by 2025 (Committee on Climate Change report). Again one can only conclude that developers consider the installation of such technologies too expensive. There is no mention of any of these in the plan or of what energy efficient measures will be encouraged and how these will be enforced as part of the aim to minimise the effects of climate change.

In 2018 Darlington Borough Council declared a climate change emergency. This plan shows no evidence in trying to mitigate that emergency; in fact Policy H10 only goes to exacerbate it with its rural location and reliance on car journeys to get to the centre of town or to work. Given the extent of the development at Policy H10, this plan will

not minimise the impact of climate change and will only go to increase its effects further.

***To make this plan sound***

We would advocate that the plan enforces the use of energy efficient measures and low carbon technologies on all new developments.

Policy H10 is also reviewed given the detrimental effect its increased car journeys will have on the climate and the objective of minimising the effects of climate change.

**Policy H1 – Housing Requirement**

Whinfield Residents Association objects on the following grounds:

In relation to Policy H1 we do not believe that the plan has been positively prepared, is justified or is consistent with the National Planning Policy Framework (NPPF).

***We consider Policy H1 to be unsound for the following reasons.***

The calculation of housing need does not follow the standard method as required by the NPPF, nor does it clearly demonstrate, using well evidenced and justifiable methods, that there are exceptional circumstances that exist which would justify an alternative approach. Using the standard methodology a housing yield of 3.476 new dwelling will be required over the plan period, given that the current housing commitments for Darlington are 4,974, this is more than sufficient to cover the plan period, so in essence, following the standard methodology, there is no need to allocate any further land to cover Darlington's needs. The 9,840 quoted in the plan is not justified by any amount of investigation.

We have also noted that there is no apparent analysis of the availability of brownfield sites or empty properties within the Borough. The NPPF clearly states that as much use as possible should be made of previously developed or brownfield land, this Plan is therefore a direct contravention of the NPPF.

The housing requirement is based upon the Darlington Strategic Housing Market Assessment (SHMA) 2017, which states that the document should not be considered in isolation, and also that much of the Darlington SHMA 2015 remains as the most recent evidence base. The National Planning Policy Framework advises that exceptional circumstances reflect current and future demographic trends and market signals, yet this report appears to mainly be based on 2015 evidence.

The NPPF also states that policies should be clearly written and unambiguous; however, this does not seem to be the case with the Housing Requirement calculation. How local administrative data such as NHS patient registers, the number of school children and those aged over 65 is used to justify that exceptional circumstances exist to deviate from the standard methodology is not clear. Administrative data is also subject to flaws as in the period 2011-2016 there was an influx of EU workers into the area, many of whom have now left.

Furthermore NPPF suggests that exceptional circumstances may also exist where current market signals indicate such a deviation to be exceptional. The SHMA stated that on the whole market signals do not indicate any need for housing adjustment. Darlington does not have a housing shortage and the market currently reflects this in terms of availability and pricing. No exceptional circumstances therefore exist in terms of market signals which would justify the need to increase the housing requirement.

The plan includes several assumptions which have been made but does not evidence what these assumptions are and how exactly they have increased the number of dwellings by over 100% above the standard methodology calculation.

The housing requirement makes an allowance for economic growth and 7,000 full time additional jobs over the plan period but there is no evidence to support this. The recent arrival of Amazon may have created new jobs, but this should not be taken as evidence that 7,000 full time additional jobs will be created in Darlington over the plan term. Amazon is a one off, and job creation like that has not been seen for some time in Darlington. In fact the jobs created by Amazon have only served to partially offset the many jobs lost in the past few years. When you also consider that Amazon is continually looking to use automation with robot technology to replace its workforce, one wonders just how many of these jobs will exist in a few years time.

It is not clear whether or not these 7,000 additional jobs are in fact, only replacing the jobs lost over the last number of years, and if they are, this would not be evidence to support an increase in the housing requirement. Interestingly the economic projections Darlington purchased from Oxford Economics to predict future growth actually forecast for the period 2016-2036 negative growth. Darlington chose to ignore this and relied instead on the SHMA data. The SHMA itself refers to the projected 7,000 jobs as aspirational and states that this figure includes full and part time workers. The SHMA 2017 contradicts and does not support the 7,000 full time equivalent additional jobs quoted in the plan.

Support for economic growth in itself is not evidence that it will actually materialise and in this plan there is no evidence founded on facts to support that it will. Aspirational figures are not 'exceptional circumstances that exist' which justify an alternative approach to the standard method of calculation.

Brexit is likely to have a substantial effect on the economy yet there is no mention of the potential impact that it will have on these estimates. This is yet another demonstration that the 'exceptional' circumstances leading to the deviation from the standard methodology do not reflect current circumstances.

Notwithstanding the above, Covid-19 has had a significant effect on economic growth with many businesses cutting back on jobs and plans to expand. To not re-examine the housing allocation, or the estimate of 7,000 new jobs in the light of the current and future effects of the Covid-19 virus is not, in our opinion, being honest or realistic. This only goes further to support the fact that the evidence supporting the housing allocation is not justifiable given current circumstances and that the evidence the plan purports to use is not founded by facts.

Overall the exceptional circumstances upon which Darlington Council have based their deviation from the standard methodology are assumptions, estimates and guesswork, none of which is current, justifiable or evidenced on facts.

*To make this plan sound*

We would advocate that a transparent and justifiable method of demonstrating that the 492 dwellings quoted in the plan are required is used and that this is broken down into a calculation which identifies what the standard methodology is and how each of the categories in the 'local administrative' data used contributes to the deviation and exactly how they are exceptional.

We would ask that the estimates included in the plan with regards to the housing requirement and economic growth are reviewed in the light of the existing and future impacts of Covid-19 and the potential impacts of Brexit.

We would ask Darlington Borough Council for a clear explanation of how it has taken account of market signals in their housing requirement calculation.

**Policy H10 – Skerningham Strategic Allocation**

Whinfield Residents Association objects on the following grounds:

In relation to Policy H10 we do not believe that the plan is justified or consistent with the NPPF.

*We consider policy H10 to be unsound for the following reasons.*

We believe that the proposal to allow the loss of green space in the Skerningham 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. We 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.

Whinfield Residents Association 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.

***To make this plan sound***

We would expect that there be no conflict with policy ENV4, the Darlington Landscape Assessment or policy IN1. We would also expect a clear explanation of how the Council intends to mitigate the increase in the volume of traffic on already full to capacity local roads, which to date they have not. If Policy H10 is unsustainable and, if these conflicts cannot be removed or explanations provided then Policy H10 should be removed from the Local Plan.

**Policy ENV3 – Local Landscape Character**

Whinfield Residents Association objects on the following grounds:

In relation to Policy ENV3 we do not believe that the plan is justified when taken into consideration with Policy H10 above.

***We consider policy ENV3 to be unsound for the following reasons.***

Policy ENV3 is contradicted by Policy H10 as Policy H10 involves development in the area between Darlington and Barmpton Village which Policy ENV3 states should be retained.

***To make this plan sound***

We would expect that the Council revisit Policy H10 so that it is in line with other policies in the Local Plan.

**Policy ENV7 – Biodiversity and Geodiversity and Development**

Whinfield Residents Association objects on the following grounds:

In relation to Policy ENV7 we do not believe that the plan is justified when taken into consideration with Policy H10 above.

***We consider policy ENV7 to be unsound for the following reasons.***

Point F of policy ENV7 refers to wildlife friendly green spaces, parks and parklands, in particular to protect and improve the wildlife value of green spaces, parks and

parklands. Given that Policy H10 intends to build directly on these green spaces currently inhabited by wildlife policy ENV7 directly conflicts with Policy H10.

***To make this plan sound***

We would expect that the Council either remove Policy H10 from the Local Plan or amend it so that it does not conflict with the other policies within the Local Plan.

**Policy IN1 – Delivering a Sustainable Transport Network (Strategic Policy)**

Whinfield Residents Association objects on the following grounds:

In relation to Policy IN1 we do not believe that the plan is consistent with the NPPF requirements of sustainability.

***We consider policy IN1 to be unsound for the following reasons.***

There is a conflict of interest between the principles of Policy IN1 and the delivery of Policy H10.

***To make this plan sound***

We would expect that the Council should either be remove Policy H10 from the Local Plan or amend it so it does not conflict with other policies in the Plan

In addition to the points raised above, Whinfield Residents Association would like to make the following comments with regards to the actual Plan preparation and how it has been conducted, which also raise questions with regards to the ‘soundness’ of the plan and any pre-judgements.

Whinfield Residents Association has been led to believe that before to the draft Local Plan consultation process in 2018, Darlington Borough Council Cabinet had already approved the building of 1,800 houses in the Skerningham Development on the 25<sup>th</sup> January 2018. There was no meaningful involvement or consultation with local residents before to this approval.

Whilst we cannot disagree with Policy IN8 regarding Broadband connectivity we would ask that the following be taken into consideration

- BT Openreach has already commenced facilitating fibre broadband to the Skerningham Development without the plan having actually been approved – could this be construed as pre-judgement?
- The lines providing this broadband connectivity run in front of the current dwellings on Barmpton Lane, yet a bypass has been installed so that residents of Barmpton lane will not be able to connect to the fibre broadband. With regards to the principles of the NPPF regarding detriment to existing residents this could be construed as detrimental even before the plan is approved?

We would also question why the Council has chosen to conduct its Representation period in the middle of a pandemic having regard to the fact that there are potentially a significant number of Darlington Residents who do not have internet access and will

therefore be digitally excluded from this Representation. Despite the change in regulations regarding what the Local Authority has to do during this pandemic, in the interests of the NPPF and achieving fair and proportionate engagement we have tried to lobby the Council to postpone this Representation until it is fair to all. They have refused to do so despite our evidence on digital exclusion.

Overall, Whinfield Residents Association can only conclude that this plan fails to meet the tests of 'Soundness' in particular in relation to policies H1 and H10 as well as other factors in the NPPF guidance and apparent pre-judgement, and as such the Local Plan should be reconsidered. The Local Plan Representation has also been presented during the middle of a pandemic when fair and proportionate engagement with all residents is limited and, in our view should be postponed until fair engagement by all is possible.

Given that Whinfield Residents Association are seeking changes to the Local Plan we would consider it necessary for us to participate in the Examination Hearing. We would consider it necessary as it is our Ward that will be most affected by the Local Plan and as such we, as residents of that Ward, should be given the opportunity to put forward our concerns to the Planning Inspector.

We would also request to be notified of the following:

- When the submission of the Local Plan to the Secretary of State for Independent Examination under section 22(3) of the regulations has been made.
- When the publication of the Inspectors recommendations/ report of the examination of the Local Plan is due.
- When the adoption of the Local Plan will occur.

Kind Regards

Judith Murray  
Secretary

**Whinfield Residents Association  
Inc. Friends of Beech Wood**