

Comment

Consultee Anne Rudkin (1171376)

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

Comment by Anne Rudkin (1171376)

Comment ID DBLPPS116

Response Date 13/09/20 17:00

Consultation Point Policy DC 1 Sustainable Design Principles and Climate Change (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) . 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.

In relation to Policy DC1, in particular, para 5.1.8, I 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 draw the conclusion 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.

Question 4

Changes Sought

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

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

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

Comment by Anne Rudkin (1171376)

Comment ID DBLPPS117

Response Date 13/09/20 17:00

Consultation Point Policy H 1 Housing Requirement (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)

- 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.

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.

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 amount 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.

The plan includes a number of 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 evidence that 7,000 full time additional jobs will be created 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 are 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 it will have on these estimates. This is yet another demonstration that the 'exceptional' circumstances leading to the deviation from 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 Covid-19 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 clearly founded by facts.

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

Question 4

Changes Sought

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We would advocate that a transparent and justifiable method of demonstrating that the 492 dwellings are actually 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 is reviewed in the light of the existing and future impacts of Covid-19 and the potential impacts of Brexit.

We would ask the local authority for a clear explanation of how they have taken account market signals in their housing requirement calculation.

Question 6

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

Comment by Anne Rudkin (1171376)

Comment ID DBLPPS118

Response Date 13/09/20 17:00

Consultation Point Policy H 10 Skerningham - 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

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I 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. I 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.

Question 4

Changes Sought

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

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