

Comment

Consultee	Mrs Elizabeth Steel (1186189)
Email Address	[REDACTED]
Company / Organisation	St Edwin's Church
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	St Edwin's Church (Mrs Elizabeth Steel - 1186189)
Comment ID	DBLPPS499
Response Date	17/09/20 13:00
Consultation Point	Policy H 2 Housing Allocations (Strategic Policy) (View)
Status	Processed
Submission Type	Letter
Version	0.4
Question 1a	
Do you consider that the Local Plan is Legally compliant?	No
Question 1b	
Do you consider that the Local Plan sound?	No
Question 1c	
Do you consider that the Local Plan complies with the Duty to Cooperate?	No
Question 2	
Do you consider that this part of the Local Plan is unsound because it is not: (tick all that apply)	<input type="checkbox"/> Positively prepared <input type="checkbox"/> Effective <input type="checkbox"/> Justified <input type="checkbox"/> 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 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.

Removal of the Strategic allocations at Coniscliffe Park.

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? No, I do not request to be notified

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Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	St Edwin's Church (Mrs Elizabeth Steel - 1186189)
Comment ID	DBLPPS502
Response Date	17/09/20 13:11
Consultation Point	Site 41 - Coniscliffe Park, South (View)
Status	Processed
Submission Type	Letter
Version	0.3
Question 1a	
Do you consider that the Local Plan is Legally compliant?	No
Question 1b	
Do you consider that the Local Plan sound?	No
Question 1c	
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Question 2	
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Event Name	Darlington Local Plan 2016-2036 (Regulation 19)
Comment by	St Edwin's Church (Mrs Elizabeth Steel - 1186189)
Comment ID	DBLPPS504
Response Date	17/09/20 13:13
Consultation Point	Site 249 - Coniscliffe Park, North (View)
Status	Processed
Submission Type	Letter
Version	0.4
Question 1a	
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