

Comment

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| Consultee | Mr Ken Maddison (1178283) |
| Email Address | [REDACTED] |
| Address | [REDACTED] [REDACTED] [REDACTED] |
| Event Name | Darlington Local Plan 2016-2036 (Reg. 19) Sustainability Appraisal |
| Comment by | Mr Ken Maddison (1178283) |
| Comment ID | DBLPSA1 |
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| Do you agree with this content? | Object |

Please tell us why

I have previously submitted comments around sustainability and feel the comments have not been correctly assessed and acted upon in line with various existing guidance. I am also more than disappointed to feel that an appropriate response to a number of previous approved policies which have now been disregarded and in essence scrapped without reasoning, or consultation. The best example is one of sites 41 and 249 which were deemed "difficult to develop" with a number of strategic and infrastructure issues. Nothing has happened to the sites to alleviate these previously highlighted issues but has now appeared within the plan. I appreciate by spending a significant amount of money along with significant construction all of the issues could be mitigated but from a sustainable point of view I feel other areas of the town should be targeted in the first instance.

Below are the headings used for the sustainability framework, and I have tried to make comments to demonstrate the soundness and legal points that have been either excluded or not included within the plan. I have

- 1 Provide a mixture of affordable, well designed and sustainably located new housing, and improve the standard of existing housing, especially to provide for young people, families and older people. *The plan seems to have not got the correct mix of housing types required for the next 20 years with little evidence of the thought process. Currently new jobs as well as existing jobs are very much under pressure and the numbers put forward I think are*
 - 1 *over assessed and against the government guidance*
 - 2 *The wrong mix of houses in the areas being put forward*

3 *Very little in anything to promote the areas of the town that require improvement ie Brownfield sites and more socially acceptable housing on such sites*

1 *Develop vibrant and cohesive communities.*

It feels as though the document and plan is to stretch the town into the countryside and hence make the borough more fragmented and split communities rather than develop exiting sites within the town and villages using land and sites that require improvement

1 *Improve the health and wellbeing of all, reduce health inequalities and promote healthier lifestyles. By including the "call for site" approach this I think has potentially ruined the many greenfield locations we have benefited from over the many years and is against the councils policy of a more healthier lifestyle and sustainable land using existing land previously developed and now standing dormant. By promoting development on brownfield sites this would enhance the health and wellbeing much more of the Borough and also of the landscape*

1 *Provide education and training opportunities to improve the skills and employment prospects of the resident population.*

2 *Improve the safety and security of people and property.*

3 *Achieve sustainable levels of economic growth and increase employment levels and access to sustainable and high quality employment opportunities.*

The plan put forward with the modelled predictions of employment and growth along with the housing figures that are not in line with Government guidance where all completed over 4 years ago and along with a change in political leadership have not been reassessed. This had been promised by the new leadership but has not been carried out neither has an extended consultation following the new management. I was not allowed to speak at the Council meeting where the plan was approved to bring this point forward.

The very unfortunate position we find ourselves in with Covid of course has not been built into any of the plan and along with the Brexit position feel that Government policies and guidance should be considered with further consultation on the back of these issues. A reassessment of the plan should take place to ensure we are correct and in line with current policies, guidance and processes and to take into account Brexit impact along with the Coronavirus pandemic effects on the economy.

1 *Encourage sustainable travel. Provide development which reduces reliance on private vehicles, maximising access to public transport and active travel modes.*

I have identified a number of inaccuracies in different policies a couple of examples are below

1 *Darlington Transport plan does not show the proposed outer ring road (Coniscliffe Road – A68) which is inferred in the local plan.*

2 *This outer road also does not feature in the Tees Valley Strategic Transport Plan*

3 *The councils figures for house / vehicle ratio for new development suggests a higher figure than what has been applied for some of the developments in particular site 41 and 249 which has a knock on effect to strategic existing roads and proposed alterations towards Cockerton and West Auckland Road mini roundabouts.*

Basic inconsistencies of base figures and policies with no interconnection of both local, and regional documentation are masking some of the suggestions for site development.

1 *Reduce greenhouse gas emissions and increase the Borough's resilience to climate change. The proposed building of 10 000 houses over the period I do not think has included the zero emissions aim we should all have, without some major rethink on these developments and modes of transport the gas emissions will most certainly rise*

1 *Make the most efficient use of land and resources.*

It is very apparent that the best most efficient use of land and resources have not been made in particular to old disused and small unused pieces of land that have the strategic infrastructure already in place and are not being promoted and encouraged to enhance the borough. These sites should be prominent and promoted before any other greenfield site are considered.

An example is site no 26 which looks as if it has been ignored in the Local Plan for housing numbers which would likely assist first time buyers and social affordable housing number before building on greenfield sites. Maybe a land timeline should be included within the plan?

1 *Minimise levels of noise, vibration, odour and light pollution.*

A number of the proposed developments are closer than the existing current housing stock in relation to the A1M Motorway, the noise currently from the road exceeds the current 55Db levels that is required.

The new suggested greenfield sites would be considerably closer and therefore exposed to both excessive noise and gas emissions than should be expected

1 Avoid and reduce flood risk from all sources including fluvial, surface water and sewer flooding. *Again a significant amount of flood alleviation construction will be required to ensure further flooding is not extended thus causing issues for residents, EA and Northumbrian Water who all have very tight targets to meet from flooding. Would it not be better to target areas that already have the infrastructure in place eg South East Darlington which has major infrastructure in place on the back of the old Paton and Baldwins site*

1 Protect and enhance air and water quality and make efficient use of water. *I cannot see anything within the plan that demonstrates the planning of the above, I can only see a reduction of the above unless some reduction or differing policies towards building which has not been included*

1 Protect and enhance biodiversity and geodiversity.

2 Protect and enhance green infrastructure of all types.

This is an area which would again benefit from using existing buildings eg Northgate House, this would alleviate the need to build on Greenfields. It feels like the council have not fully explored all the existing sites

1 Protect and enhance the character and quality of Darlington's landscape.

2 Conserve and enhance Darlington's distinctive and valuable historic environment.

Both for 15/16 the size and locations of the proposed housing do not fit with the above. Tidying up the existing locations to enhance the Town should be a priority particularly with the forthcoming 200 year anniversary of the railways.

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Please tell us why

In reply to the two sites 41 and 249 a few things should be noted

Both sites are on the edge of the towns only Water Treatment works with Chlorine storage on site which Northumbrian Water have a very rigid policy for escape of the substance which is wind directed, this could effect these proposed developments. This was omitted from the table

Overhead powerlines are also over the sites in various places and one line just renewed and the table suggest no overhead lines on the two sites.

The bus service to the closed point of the site has been recently cut so a more frequent service would be over 1600m.

Staindrop Road at Mowden Bridge does suffer flooding on the strategic road and from time to time has got to be shut. The road was 100mm from flooding in February 2020

The entire sites fall into the Low Coniscliffe and Merrybent parish and a Neighbourhood plan has been drawn up and approved by all including including Darlington Borough Council. This plan suggest no development of these two sites 41 and 249, from a soundness and legal point of view a conflict clearly occurs hear and currently the local Neighbourhood plan is a new approved plan so why go against all that work which has already been carried out