

Whilst I support many aspects of the Darlington Local Plan 2016-36, it is not positively prepared or justified in the following areas as per the Planning Inspector's note (no.2 Darl IN2 refers).

#### **1. Legal and Procedural.**

(f) It is not clear how this plan contributes to the UK carbon targets or the UK 25 year environmental plans. Indeed the carbon footprint in the local plan seems to be increasing and not decreasing with the amount of new roads required to serve out of town developments and resultant traffic increases.

#### **4. Housing**

a(i) The Darlington 5 year Housing Land Supply requirement (SD07) has identified far more land for development than is actually required to satisfy the housing and employment needs of the borough. This overplanning may lead to developers 'banking land' and even blight areas.

(ii) The plan fails to adequately justify the housing figures which exceed the Government's own forecast (Office of National Statistics) for housing growth in this area.

B The plan would indicate that housing and employment forecasts can be met without major out of town developments like Skerningham Garden Village.

#### **5. Requirements for housing developers.**

c) There is no requirement in the Local Plan to provide energy efficient homes or carbon savings for new build homes.

#### **9. Transport and Infrastructure**

a) This Local Plan in conjunction with SD42 Tees Valley Strategic Transport Plan 2020-30 and the SD46 Darlington Local Transport Plan 3 promotes a significant road expansion. Out of town developments like Skerningham and new locations for employment rely on a plethora of new road networks for connectivity, yet plenty of offices and industrial units in the area with good connectivity remain vacant.

b) (i) Proposed link roads between Skerningham Village, the Darlington Northern Relief Road and Darlington will exacerbate existing traffic congestion and air pollution along the A1150.

(ii) Improving east/west connectivity to Teesport is important but the Local Plan and the Tees Valley Strategic Transport Plan makes no reference to gauge improvements on the rail network serving Teesside, to help take lorries of our local road network.

(iii) Relocating existing rail stations or a new station to better serve new developments and encourage public transport does not feature in the plan.

g) The plan contains no references to improving air quality and the carbon footprint. Whilst new technology may help deliver these outputs but this will be at the end of the plan in circa 2030-36. In the meantime the air quality will degrade from the increased traffic. The local plan does not describe how it will address this shortfall.

## 10. Environment

g) SD38 Darlington Green Infrastructure Strategy 2017-36 aims to provide a connected network for wildlife to live and breed and aims to improve biodiversity value of the urban fringe and countryside. Proposed developments such as Skertingham Garden Village (4,500 homes, school, shops) and Coniscliffe Park (1,500 homes) on the boundary between town and countryside appear to directly conflict with this strategy.

h) The plan mentions mitigating wildlife losses and biodiversity net gain but the only species likely to gain will be garden birds and opportunistic species that can tolerate a more urban environment. The loss of farmland, mature woodland, hedgerows and riparian habitat to housing, employment, road development and disturbance from human encroachment is not adequately mitigated. Woodland and riparian species will suffer reductions but the biggest losers in the Local Plan will be farmland birds. The plan contains no measures whatsoever for mitigating farmland bird losses despite the species featuring prominently in the Teesside Biodiversity Action Plans. Such species are sensitive to human encroachment and disturbance and certainly cannot survive if their habitat is lost to development.

I trust these comments will be considered by the Planning Inspector and that they will help him in his deliberations to recommend some main modifications to the Darlington Local Plan.

If you require any further information please do not hesitate to contact me.

Kind regards,

David Phillips