

Ken Maddison

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**written statement for Matter 1 subjects**

**Tuesday 25 May am**

**Public consultation and engagement**

The Council's Submission Consultation Statement sets out how it involved residents and other stakeholders in preparing the Plan and concludes that consultation was undertaken in accordance with the relevant regulations and the Council's Statement of Community Involvement which was published in July 2016 and updated in August 2020 to take account of coronavirus restrictions.

Q1.2. Is there any substantive evidence to demonstrate that the public consultation carried out during the plan-making process failed to comply with the Council's Statement of Community Involvement or legal requirements?

Q1.3. Was the Plan shaped by early, proportionate and effective engagement with communities, local organisations, businesses, infrastructure providers and operators, and statutory consultees?

**I would like to think that the basis of a long term Development plan takes on board broadly the wishes of the residents and businesses of the town, not housing developers, this along with setting out a strategy and realistic framework to make a better town for all to live in, work in and aim to tidy up areas that have been previously neglected. In particular in light of the historic forthcoming 200 year anniversary of the 1825 Stockton to Darlington railway celebrations. The town is a place to show off our history and sustainable culture not our over developed green spaces.**

**I think all aspects of the consultation are too historic and the basic plan is now over 5 years old with many areas, guidance and deliverables very much out of date eg Brexit, Pandemics and changes to the NPP will put a different light on needs and deliverables. A timely option / window became available following a change in council management in 2019 to refresh the plan (as per the new councils manifesto) and go out for consultation.**

**Much of the old public consultation comments do seemed to have been ignored, strategic, technical along with legal and sound (very refreshing to see the inspectors questions, relating to legal and sound have not been!)**

**Just one example is that I requested to speak at the special council meeting that brought the plan for final approval by council and was denied a 5 minute statement.**

**I am not sure how visible local resident's comments on the plan have been addressed if at all against their Statement of Community Involvement or legal requirements?**

**I find it appalling that a local Neighbourhood Plan, tax payer funded and fully approved has basically been ignored, surely this is substantive evidence that the plan making process failed to comply, with standards and policy.**

## **Sustainability appraisal**

The Council carried out a sustainability appraisal during the preparation of the Plan and published a report in August 20 2010.

Q1.4. Is there any substantive evidence to demonstrate that the sustainability appraisal failed to meet the relevant legal requirements?

Q1.5. Did the sustainability appraisal consider and compare reasonable alternatives as the Plan evolved, including for the broad spatial distribution of housing, economic and other development? Was the Plan informed by the findings of the sustainability appraisal?

**The sustainable appraisal (2010) has not particularly picked up on brownfield sites and look to expand on existing good infrastructure locations but focused on new Green field locations previously rejected. Brownfield sites in general have the infrastructure already in place and therefore reduces major elements of construction eg roads, drainage, utilities etc etc. therefore in my view making it more sustainable.**

**I feel the councils "request for land" (mainly farming) was the incorrect way of developing a local plan, one would think a strategic need and location should have been developed around infrastructure and then make requests to appropriate landowners to ensure a well thought through plan was developed. An example is Coniscliffe Park land which has on many previously occasions been quote "unsuitable for development" according to DBC due to substantial infrastructure issues which have not been resolved, and will take substantial finance which is not a very sustainable approach in my opinion when other more sustainable sites would be much more appropriate and also tidy up eyesores in the town.**

**In these days of diversification on farms which farmer would turn down the opportunity to change his arable land into much more expensive building land?**

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### **Neighbourhood Plans**

Local plans are required to make explicit which policies are strategic policies having regard to national policy and guidance.

Policy H1 table 6.1 sets out housing requirement figures for each of the five designated neighbourhood areas. The Council's response to PQ6 explains the rationale for these figures and proposes modifications to ensure that they accurately reflect the strategy and allocations in the Plan and that their purpose is clear.

Q1.9. Does the Plan set an appropriate framework, and allow an appropriate role, for neighbourhood plans in the Borough? In particular: a) Does the Plan appropriately identify "strategic policies"? b) Are the Council's proposed main modifications to policy H1 and the reasoned justification necessary to make the Plan sound with regard to the housing requirement figures for neighbourhood areas? If so, would they be effective in so doing?

**The 2019 LC&M NP is an approved well thought through document funded using taxpayers money, surely DBC must adhere to the plan and build on it for the rest of the town, if not why not and what is then the point of the Neighbourhood Plan if much of the basic aspects have been ignored.**

### **Viability**

The Council's Local Plan Viability Assessment provides evidence about the economic viability of development proposed in the Plan. The Council's response to PQ44.1 advises that site specific viability assessments for each of the Greater Faverdale and Skerningham strategic allocations are being finalised and that, as a minimum, a summary of these assessments will be published within statements of common ground for both sites by the end of March 2021.

Q1.14. Is the Plan informed by a proportionate and up to date assessment of viability that takes into account all relevant policies, and local and national standards?

**As most of the Local Plan data is 5 years out of date and as previously said many changes have occurred in that period, are the proposed suggestions now appropriate. Other such areas that have changes eg NPP, DBC policies for example:-**

- 1. DBC's housing and associated traffic design suggested new houses are now seen to have 2.2 cars per household and the highway assimilation model is only using 1 car per property, and are making the mitigation fit the figures.**
- 2. Strategic Link roads not included in either DBC or Tees Valley strategic transportation policies, demonstrating a lack of joined up management and lack of forward planning.**
- 3. 7000 Net new jobs, requiring nearly 10000 new houses are these just very aspirational or can this be soundly justified in today's climate.**

Q1.15. Does the viability evidence demonstrate that the policies in the Plan are realistic, and that the cumulative cost of all relevant policies will not undermine deliverability of the Plan?

**A number of the developments suggested will require some significant costly enhancements to the infrastructure and really need to be in place before any development takes place, to relieve current pinch points. The plan does not address these timelines or who will bear the cost of the projects, as holistic fully costed developments could demonstrate a lack of viability .**

**Take drainage, much of the outlying suggested development will require many pumping stations and retention ponds or tanks whereas much of this is in place within the town and could be readily accessed making the latter option much more sustainable as well as cleaning up the town.**